R10 - TSCA/PCB EPA INSPECTION
CONCLUSION DATA SHEET (ICDS) (Rev April2008)

Inspectors Name Bruce Long Phone No.: 503-326-3686

1. **Facility Name**: Rainier Commons, LLC

2. Street Address: 3100 Airport Way South

3. City, State, Zip: Seattle, Washington 98134-2116

4. Latitude: 47.576224 Longitude: -122.321200 (helpful)

5. SIC (4-digit) _____ or NAICS Code (5/6-digit): 445290, 721310

6. Small Business: **X** Yes ☐ No
(a small business or entity employs 100 or fewer individuals within all facilities and operations owned by the business. The numbers of employees should be considered as full time equivalents (2000 hs per year of employment).

7. Environmental Justice (Check one):

	Low Income
	Minority Population

	Minority Population & Low Income
X	Other

8. **Date of Inspection: Begin: 03 / 24 / 2009**
End: 03 / 24 / 2009

9. Compliance Monitoring Action Reason: (Circle one of the following)

	Agency Priority
X	Citizen Complaint/Tip
	Core Program

	Random Evaluation or Inspection
	Selected Monitoring Action

FY2008 Regional Priorities

X	Support the Core
	Clean Affordable Energy and Climate Change
	Enhancing Tribal Environments
	Protecting and Restoring Watersheds
	Sustainability and Strategic Partnerships

10. Number of Days spent physically conducting the activity: 1

12. Number of Hours spent physically conducting the activity: 8

13-14. Did you observe deficiencies (potential violations) during the on-site inspection?
X Yes (if yes, you must answer the following two questions)
☐ No (if no, you cannot answer the following two questions)

Deficiencies Observed: Check one or more of the following

	Potential failure to complete or submit a notification, report, certification or manifest
	Potential failure to follow a permit condition(s)
X	Potential failure to identify or manage a regulated waste or pollutant in any media
	Potential failure to maintain a record or failure to disclose a document
X	Potential failure to obtain a permit, product approval or certification
X	Potential failure to report regulated events such as spills, accidents, etc.
	Potential violation of a compliance schedule in an enforcement order

15-16. If you observed deficiencies, did you communicate them to facility during the inspection?

X Yes (if yes, you must answer the next question regarding Action(s) Taken)

☐ No (if no, you cannot answer the next question)

17. Did you observe or see the facility take any actions during the inspection to address the deficiencies communicated to the facility?

☐ Yes (if yes, identify the action taken below) **X** No

Action(s) taken

	Completed a Notification or Report
	Corrected Record Keeping Deficiencies
	Implement New or Improved Management Practices or Procedures
	Reduced Pollutant (use reduction, industrial process change, emissions or discharge change)
	Requested a Permit Application or Applied for a Permit
	Verified Compliance with Previously Issued Enforcement Action

18.. Did you provide general compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections? **X** Yes ☐ No

19. Did you provide site-specific compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections? ☐ Yes **X** No
Note: This form does not require EPA inspectors to provide compliance assistance.

20. Optional Information: Describe actions taken by the facility or assistance provided to the facility

EPA Region 10
PCB Compliance Inspection Report

Inspection Information

Facility Name: Rainier Commons, LLC

EPA ID Number: WAD051230004

Inspection Date: March 24, 2009

Inspection Type: 6PF / NSR - US

Inspection Team: Bruce Long, USEPA Oregon Operations Office, Office of Compliance and Enforcement, Inspection and Enforcement Management Unit; 503-326-3686. long.bruce@epa.gov. Tristen S. Gardner, Pesticides and Toxics Unit. 206.553.6240. gardner.tristen@epa.gov.

Site Contact Information

Contact Name/Title: Mr. Eitan Alon, Property Manager; Ariel Development, LLC

Location Address: 3100 Airport Way South, Seattle, Washington 98134

Latitude: 47.576224 **Longitudes**: -122.321200

Mailing Address: 1425 5th Avenue, Suite 2625, Seattle, Washington 98027

Phone Number: 206-447-0263 x203

Fax Number: 206-447-0299

Report Information

Report Start Date: March 24, 2009 **Date Report Completed:** April 16, 2009

Report Author Name: Bruce Long

Report Author Signature: Bruce Long

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Attachments

General Facility Information

The Rainer Commons, located in the Georgetown District of South Seattle, is the former Rainier Brewery Building which was first built in 1884. The Old Brewery is an approximately 4.57 acre parcel with 26 buildings located at 3100 Airport Way South, Seattle, Washington. The Brewery is bound by South Stevens Street to the north, by South Horton Street to the south, by Interstate 5 to the east and Airport Way to the west (Maps, Page 1). The property was purchased by Rainier Commons, LLC in August 2003 from the Benavoya Foundation (Attachment III, Page I). The properties current use is a coffee roasting and storage facility, artist loft (Music and other arts), and two restaurants.

The Rainier Commons is owned by the Rainier Commons, LLC, but is managed by Ariel Development, LLC. There are common members in both organizations (Attachment III).

Facility NAISC No: 445290 and 721310

Current Site Contact Information: Rainier Commons, LLC

Contact Name/Title: Mr. Brett Goldfarb, Member
Mailing Address: 14255 5th Avenue, Suite 2625, Seattle, Washington 98027
Phone Number: 503-829-7200
Fax Number: 503-829-7320

Current Site Contact Information: Ariel Development, LLC

Contact Name/Title: Mr. Eitan Alon, Property Manager
Mailing Address: 3317 3rd Avenue South, Seattle, Washington 98134
Phone Number: 206-447-0263 x203
Fax Number: 206-447-0299

Current Environmental Contractor: Camp Dresser and McKee, Inc., (CDM)

Contact Name/Title: Ms. Pamela J. Morrill, LHG
Mailing Address: 11811 N.E. 1st Street, Suite 201, Bellevue, Washington 98005
Phone Number: 425-453-8383
Fax Number: 425-646-9523

Facility History

The Rainier Brewery operated at the Airport Way location from 1883 to 1999. In 1999, the property was purchased by Benaroya Foundation and then sold to Rainier Commons, LLC in August 2003[1]. The surrounding properties are small manufacturing facilities and retail stores. There is residential property to the east on the east side of Interstate 5.

In October 2005, the City of Seattle Public Utility Department (SUP) did a survey of the storm water collection system around the old brewery and found PCBs in the system that ranged from 17,500 mg/kg (ppm) to 2,200,000 mg/kg (Attachment VI). The same locations were resampled in January 2008 and the concentrations dropped by a factor of 100. In February 2008, the SPU scoured the storm water collection system around the Old Brewery and removed the PCB sediments in the storm water collection system.

It was reported by Vernon Environmental, Inc. in a report titled, Catch Basin Stormwater Field Sample Results, dated September 8, 2008, that there were six transformer vaults at the old brewery. However, the report does not identify the location of these transformer vaults and does not list the type of transformers that were in use at the time of the survey. A supplemental map was prepared by City of Seattle Public Utility Department (SUP) that shows the location of former transformers at the old brewery (Attachment I, Page 4). In a report by Farallon Consulting, Phase I – Environmental Assessment, dated April 14, 2004, Farallon states that nine transformers were found at the old Rainier facility, but all were non-PCB. The Seattle City Light owned three of the nine transformers and reported to Farallon that they were tested and found to be non-PCB transformers. The City transformers are located in a substation in front of Building 9.

In May 2006, Rainier Commons, through its consultant Vernon Environmental, Inc. (VEI) conducted a joint investigation of the storm water collection system and out of curiosity sampled the paint of the old brewery's exterior to see if it was the source of PCBs that were ending up in the storm water collection system[2]. In the VEI report the PCB concentration in the paint sample was 2,300 mg/kg (ppm) and is reported as Aroclor 1254. The City of Seattle Public Utility Department (SUP) found Aroclor 1254 in its samples of sediments collected in the storm water collection system in October 2005 and January 2008.

Other media information:

This facility is subject to regulation administered by the King County under the Clean Water Act (Storm Water Management). The facility has a Resource Conservation and Recovery Act identification assigned; WAD051230004.

TSCA Section 6(e) Notification:

As of the date of this inspection and investigation, there was no notification to EPA regarding the facilities management of PCBs and PCB remediation waste. Rainer Commons has not notified EPA of any PCB handling activities it may take to remediate the PCB waste in the storm water collection system.

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[1] Site history from Farallon Consulting, Inc., Site Assessment Report, Aril 14, 2004.
[2] Catch Basin Sediment Sample Results Report. Vernon Environmental, Inc. June 2006, Page 5.

Access:

The Rainier Commons is managed by Ariel Development, LLC. To gain access to portions of the facility, permission can be granted by members of the Ariel Development organization. There are public businesses operating at the facility, those businesses, open to the public, can be accessed during business hours.

Contact Information for Ariel Development, LLC:
Contact Name/Title: Mr. Eitan Alon, Property Manager
Mailing Address: 3317 3rd Avenue South, Seattle, Washington 98134
Phone Number: 206-447-0263 x203
Fax Number: 206-447-0299

Facility Map:

Maps and aerial photographs are under the Attachment I.

Weather:

The weather at the time of this inspection was cloudy with rain and showers off and on throughout the day. Rainfall within the previous 24-hours was approximately 0.04 inches[3].

[3] Weather Report posted by NOAA, www.NOAA.gov/sew

Description of PCB Inspection

The United States Environmental Protection Agency (EPA) intended to secure information regarding Rainier Commons, LLC's compliance with the regulations promulgated under Section 6(e) of the Toxic Substance and Control Act (TSCA). Specifically, compliance with the regulations found at 40 CFR Part 761 for the management, distribution in commerce, use, disposal, storage, and marking of PCBs and PCB items. This inspection was conducted under the authority of Section 11 of TSCA (Attachment II). This was an announced inspection.

At approximately 1:00 pm on March 24, 2009, Mr. Tristen Gardner and I arrived at the Tully's Coffee Shop located in the northwest corner of the old Rainer Brewery. Shortly after our arrival we met with Mr. Eitan Alon, Property Manger for Ariel Development, LLC, Mr. Seth Von Wald, Ariel Development and Ms. Pamela J. Morrill, consultant to Rainier Commons (CDM). Mr. Eitan Alon said he was an employee of Ariel Development, but he was there as a representative for Rainier Commons, LLC. After introductions, I presented my credentials and the Notice of Inspection (Attachment II). I reviewed the scope of this inspection with Mr. Alon and the other representatives.

We began the inspection by walking through the old brewery. Using the map provided by the City of Seattle Public Utility Department (SUP) we went to each of the locations where a transformer was believed to have been in place either in the past or currently (Attachment I, Page 4). There are two locations that we could not get access. The electrical panel seen in Photograph 6 from the Farallon Phase I Environmental Assessment Report, April 2004, is actually located inside Building No. 9. Building 9 is leased by Tully's Coffee and Tea (Tully's) and their people were not available to give us access to the room. The second location is also leased by Tully's. This is Building 20. Mr. Alon agreed to gain access to these two locations and would notify EPA when we could return and inspect the electrical panel in Building 9. Mr. Alon said to me that there was no transformer in Building 20, but EPA could inspect when Tully's granted access.

In Building 5 on the fourth floor (Noted as Floor 400) was a raised concrete pad, which is believed to be a former location for a transformer (Photograph No. P1000860). The materials stored on the pad were removed and I saw no sign of oil stains or any decolonization to the concrete. Mr. Alon said to me, the transformer had to have been removed long before Rainier Commons purchased the property.

There were some electrical switches and a fuse box on the wall in Building 5 (Photograph No. P1000862 and P1000864). These articles were not oil filled and there was no leaking potting compound from these articles.

The elevator in Building 5 is the only remaining elevator from the old brewery. On the roof of Building 5 is a small room that houses the pulley and cable along with the electrical motor and gearbox (Photograph No. P1000865 and P1000866). The gearbox is oil filled and was leaking (Photograph No. P1000866). I took a sample of the oil to be analyzed for PCBs. Table I summarizes the PCB results for the oil leaking from the elevator gearbox. In addition to the PCBs in the gear oil, Chlordane was also detected in the oil (Attachment IV).

Table I – PCB Results for Oil from the Elevator Gearbox – 3/24/2009

EPA Sample No.	Location of Sample	Aroclor	Aroclor	Results in µg/kg
09124300	Gear Oil	1254		8.9

In Building 6 on floor 5 (floor 500), I could not locate an area where a transformer could have been placed into use. This room was the former hops storage. In the past, the room was filled with tanks, but now the room is empty. I walked the entire area and saw no sign of a transformer or a place were a transformer was previously in place. At the time of this inspection, the room was completely empty.

In Building 25 on the third floor is a restaurant and bar. The corner where a former transformer was in use is now a bar and the location of a refrigerator used to store beer (Photograph No. P1000868).

The Seattle City Light Sub-Station

Exterior Paint on the old brewery was first tested by Rainier Commons' consultant in May 2006[4]. There is very little detail about the sampling event and no quality assurance data for the sample results. The table that appears in the Vernon Environmental report simply reported the exterior paint as 2,300 mg/kg Aroclor 1254.

During this inspection, I collected paint samples from the exterior wall of Building 13. This wall faces west and parallel with Airport Way. I also gathered paint chips that had accumulated in a gravel strip between Building 13 and the parking lot. This second sample also includes paint chips that had migrated to the edge of Catch Basin 2 (Attachment I, Page 5). Table II summaries the PCB results for the two Paint chip samples I collected on March 24, 2009.

Table II – PCB Results for Exterior Paint on Rainier Commons

EPA Sample No.	Location of Sample	Aroclor	Aroclor	Results in mg/kg
09124301	Wall – Building 13	1254	1260	700
09124302	Ground samples	1254	1260	10, 000

See Attachment IV

Mr. Alon said to me that his company had cleaned the building in 2005 and painted over the PCB paint to try and encapsulate it. Mr. Alon said his company is planning to do a cleaning of the exterior walls later this year (2009) and try to encapsulate the PCB paint to prevent it from continuing to peal off the building. I advised Mr. Alon that before he did this, he would need to contact EPA for approval. Rainier Commons has known about the PCBs in the paint following the sampling in May 2006.

I collected a sample from a storm water drain in the Breezeway Courtyard between Building 13 and Building 3. This is the location of Storm water Drain SD1. Sample number 09124303 is from the sediment trapped in the channel. The PCBs found in the sediment sample are approximately 105 mg/kg (ppm) (Attachment IV).

[4] Catch Basin Sediment Sample Results Report. Vernon Environmental, Inc. June 2006, Page 5.

Annual Documents:

Rainier Commons has not notified EPA using form 7710-53 to report its generation of PCB remediation waste for the removal of PCB contaminated sediment from the storm water collection system around the Old Brewery or removal of paint from the building. Records of the removal and disposal of remediation waste removed in 2005 from the storm water collection system were not available to EPA at the time of this inspection.

Manifest Review:

Mr. Alon said to me, there is no manifested remediation waste by Rainier Commons, including the disposal of sediments removed from the storm water collection system in 2005.

Out Brief:

I discussed the following with Mr. Alon, Ms. Morrill, and Mr. Von Wald.

1 – Before Rainer Commons washes down the building and removes any of the PCB containing paint, they must notify EPA at least 30 days prior to the start of the remediation.
2 – EPA still needs to see what is on the inside of the electrical panel in Building No. 9. Mr. Alon agreed to get that arranged within 30 days.

The field portion of this inspection closed at approximately 4:55 pm Pacific Standard Time (PST) on March 24, 2009.

Attachments:

Photograph Log – March 24, 2009
I – Maps; Road Maps to the Facility and Location of Electrical Equipment at the Facility
- Area View ..... Page 1
- Active Brewery (Before 1997) ..... Page 2
- Strom Drain and Combined Sewer ..... Page 3
- Transformer Locations ..... Page 4
- Catch Basin Location ..... Page 5

II – Notice of Inspection – March 24, 2009
III - Business Registration Information
- Rainier Commons, LLC ..... Page 1
- Ariel Development, LLC ..... Page 2

IV – Sample Plan and Sample Results
V – Site Assessment Report 2004 - Photographs
VI – Catch Basin Report 2008
VIII – Catch Basin Report 2009

PHOTO DOCUMENTATION

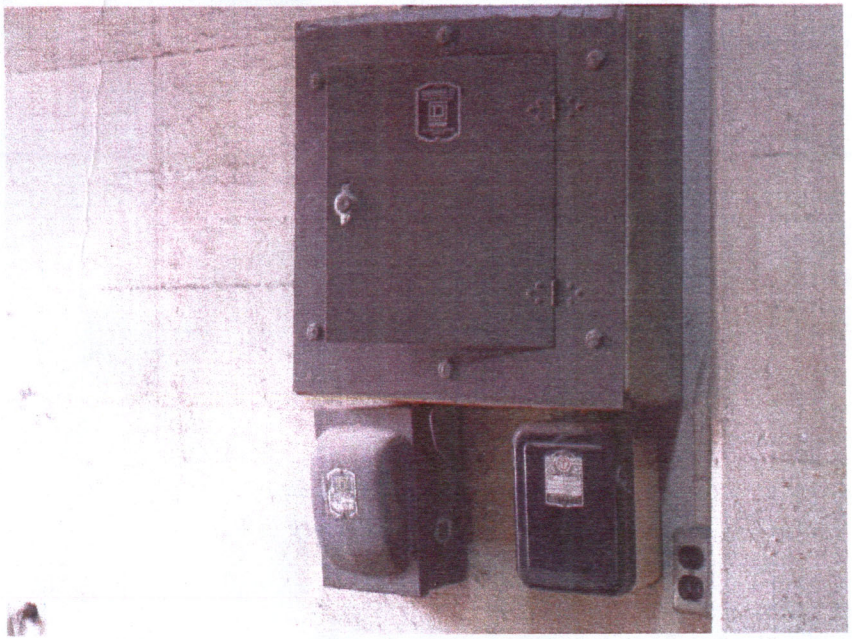
Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long

Description: Former location of a pad mount transformer inside Building 5 on Floor 400. The Farallon Report dated April 2004 stated there were leaking transformers at the Brewery, but did not identify the location of the leaking transformers. There was no visible evidence there had been any leaking transformer oil on this concrete surface.

Time: 1320

Direction: Facing west in Building 5, Floor 400.

Photo No: P1000860



Description: Electrical switches on the wall near the former transformer pad inside Building 5 on Floor 400. All were dry and no visual evidence of leaking oil, present or in the past.

Time: 1320

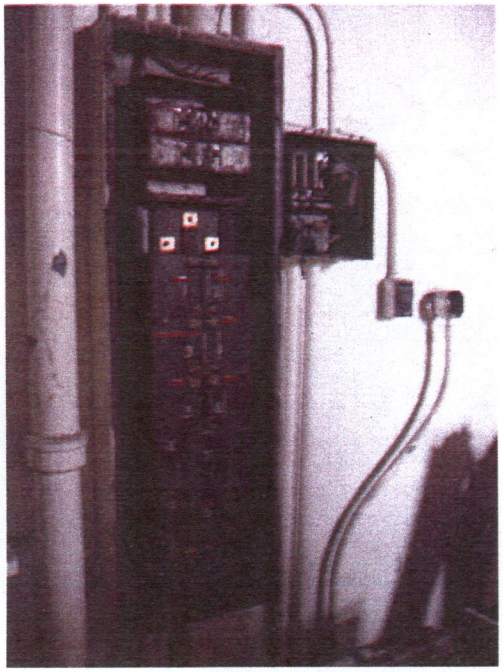
Direction: Facing Northwest, Building 5, Floor 400.

Photo No: P1000862

All times is Pacific Daylight Savings Time.

PHOTO DOCUMENTATION

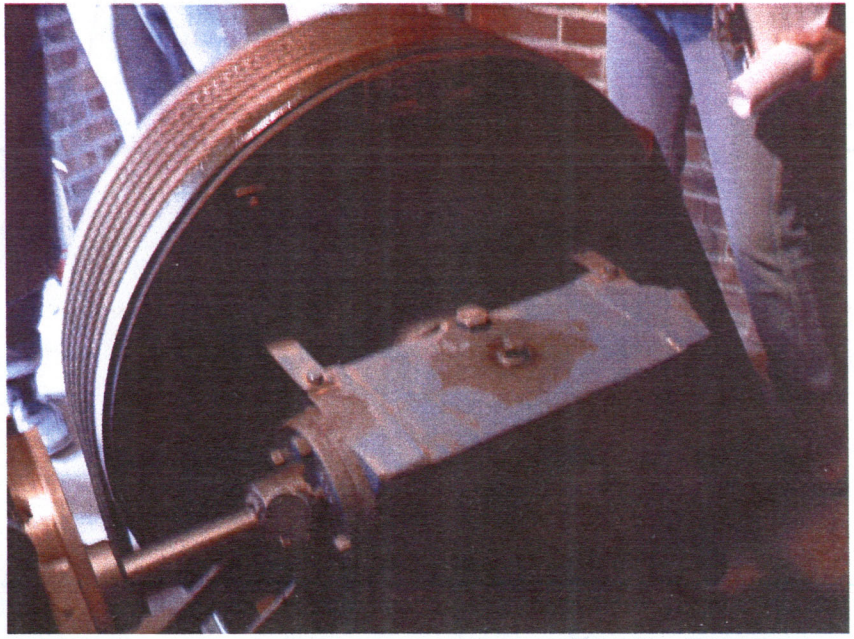
Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long



Description: **This is a**n electrical fuse box located on the south wall inside Building 5 A on the 400 floor. All articles inside the box are made of a potting compound and there is no oil-filled equipment present at the time of this inspection.

Time: 1322 **Direction:** South wall Building 5A.

Photo No: P1000864



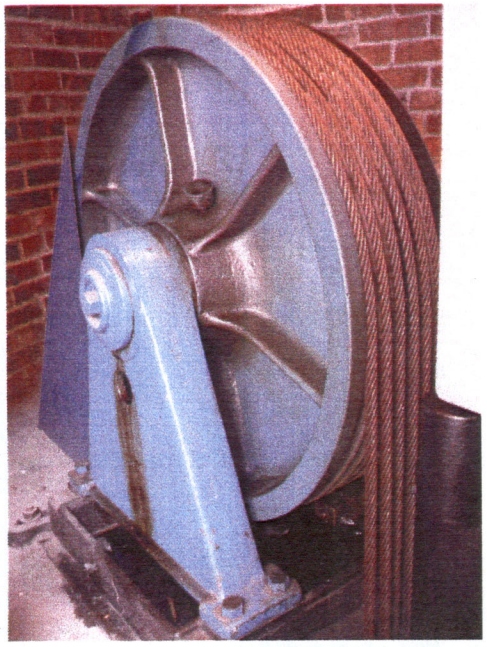
Description: This is the only elevator that remains from the day when the brewery was in operation. The elevator is located on the roof of Building 5. At the time of this inspection, oil was leaking from the gearbox into a drip pan. EPA collected a sample of the oil (Sample No. 09124300).

Time: 1328 **Direction:** Roof of Building 5.

Photo No: P1000865

PHOTO DOCUMENTATION

Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long



Description: There is a drip pan below the cable reel and is the location of the EPA sample 09124300. The oil in the drip pan is leaking onto the floor below the cable reel. The sample results show the presents of chlordane and PCBs.

Time: 1333 **Direction:** Roof of Building 5.

Photo No: P1000866

Description: The northwest corner of Building 25 is a food a d drink establishment. The north end of the bar is a former location of a transformer. The floor of the bar has been recovered and the walls painted. There is no sign of past oil leaks from equipment that may have been previously located in the room.

Time: 1420 **Direction:** Northwest corner of the Bar in Building 25, Floor 300.

Photo No: P1000868

PHOTO DOCUMENTATION

Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long

Description: In the Vernon Environmental Report date June 2006 it was identified to Rainier Commons that the old brewery buildings contained PCBs at concentration greater than 2000 mg/kg. EPA collected a sample of the paint from the west wall of Building 13 (Sample No. 09124301). The results of the analysis shows PCBs in the paint greater than 2000 mg/kg.

Time: 1431 **Direction:** West wall of Building 13.

Photo No: P1000870

Description: The gravel strip in front of the west wall of Building 13 is covered with paint chips that have broken off the buildings surface. Rainier Commons' consultant suspected that during a rain event these paint chips migrate into the catch basins around the building. The west wall of Building 13 is up-hill to Catch Basin 3 and 2 (See Draft Catch Basin Plan).

Time: 1437 **Direction:** West wall of Building 13.

Photo No: P1000873

PHOTO DOCUMENTATION

Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long

Description: The colorful reflection in the gravel strip is paint chips. EPA collected paint chips long the west wall of Building 13. EPA collected paint samples from the paint chips in the gravel strip and in the parking lot leading to the Catch Basins (Sample No. 09124302). The analysis shows PCBs greater than 2000 mg/kg.

Time: 1431 **Direction:** West wall of Building 13.

Photo No: P1000871

Description: This is a typical catch basin cover. In January 2009, Rainier Commons added silt socks to the catch basin. This sock is designed to collect sediment and paint chips that are picked up by the rain. There is a locking device on the metal cover. EPA was not able to unlock the cover for sample collection at this time of this inspection.

Time: 1433 **Direction:** Catch Basin 18 located on the east side of Building 22.

Photo No: P1000869

PHOTO DOCUMENTATION

Facility: Rainier Commons, LLC	**Lat/Long:** 47.576224/-122.321200	**Inspection Date:** Mach 24, 2009
Location: Seattle, Washington 98134	**Camera:** Panasonic/Lumix DMC-FZ7	**Photographer:** Bruce Long

Contact Name/Title: Mr. Eitan Alon, Property Manager

Location Address: 3100 Airport Way South, Seattle, Washington 98134

Mailing Address: 1425 5th Avenue, Suite 2625, Seattle, Washington 98027

Phone Number: 206-447-0263 x203

Fax Number: 206-447-0299

1. Photographer: Bruce Long, USEPA Region 10, Oregon Operations
2. Type of Camera Used: Panasonic/Lumix DMC-FZ7
3. Digital recording media: Secure Digital Media
4. All Digital Photos were copied to CD-R media
5. All digital photos were copied to a CD by: Bruce Long

At the conclusion of the inspection, I downloaded the digital photos from the camera to my work PC hard drive. I then grouped the digital images into an electronic folder with the name of the facility. I then recorded the electronic files (digital images) to a CD-R media without any editing. When completed, I then remove the electronic files on the PC. I keep all of the original photographs on the CD-R media so that they cannot be edited or manipulated in any way. I record all of the images taken during the inspection onto the CD-R media even if they were not used as evidence in the report. The camera automatically generates the digital image number sequence. Thus, the numbers assigned to the digital image start were the previous inspection ended. I have not edited or manipulated any of the photographs used in this report.

I certify that the above information is true and accurate

Bruce Long – Mach 24, 2009

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R-19
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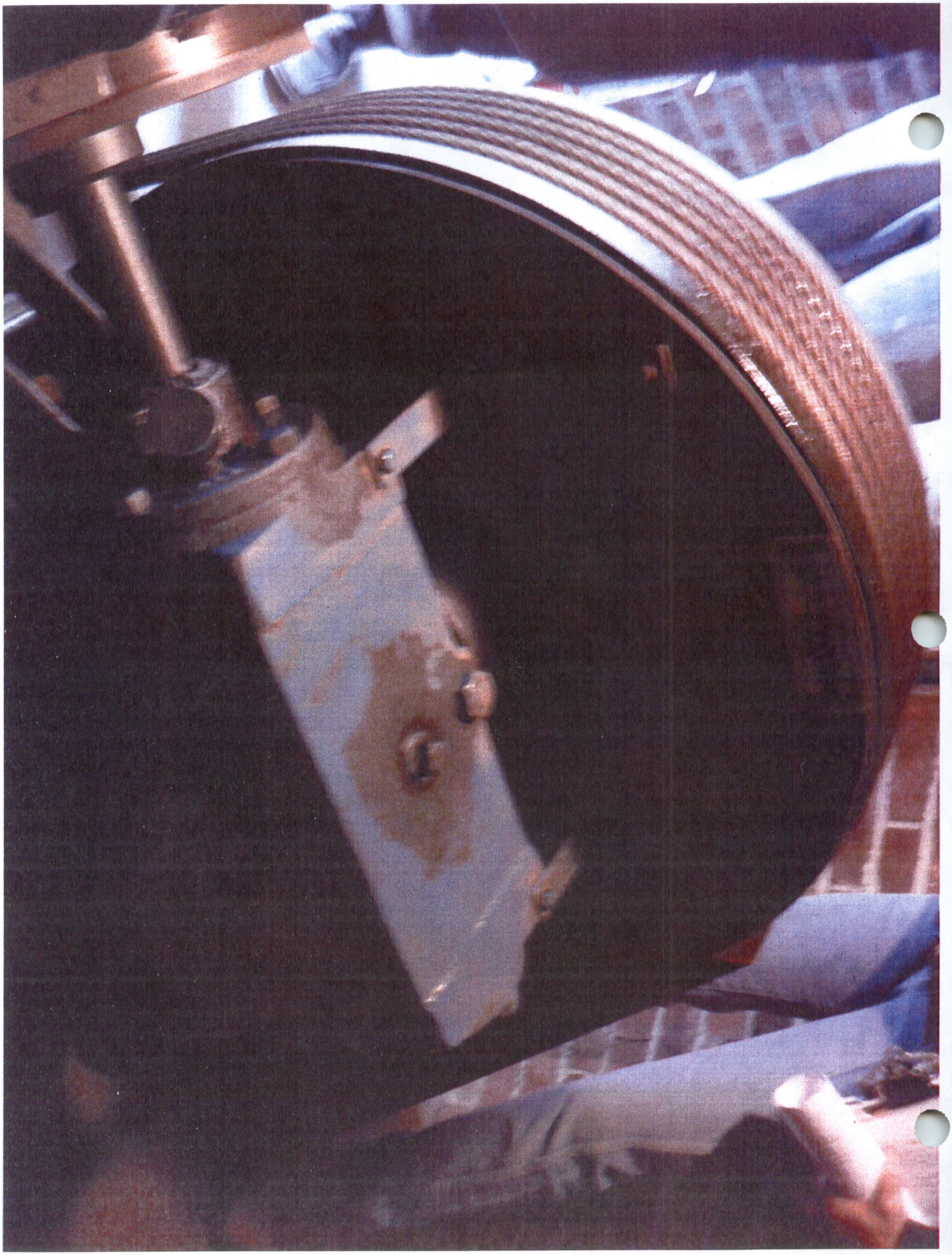

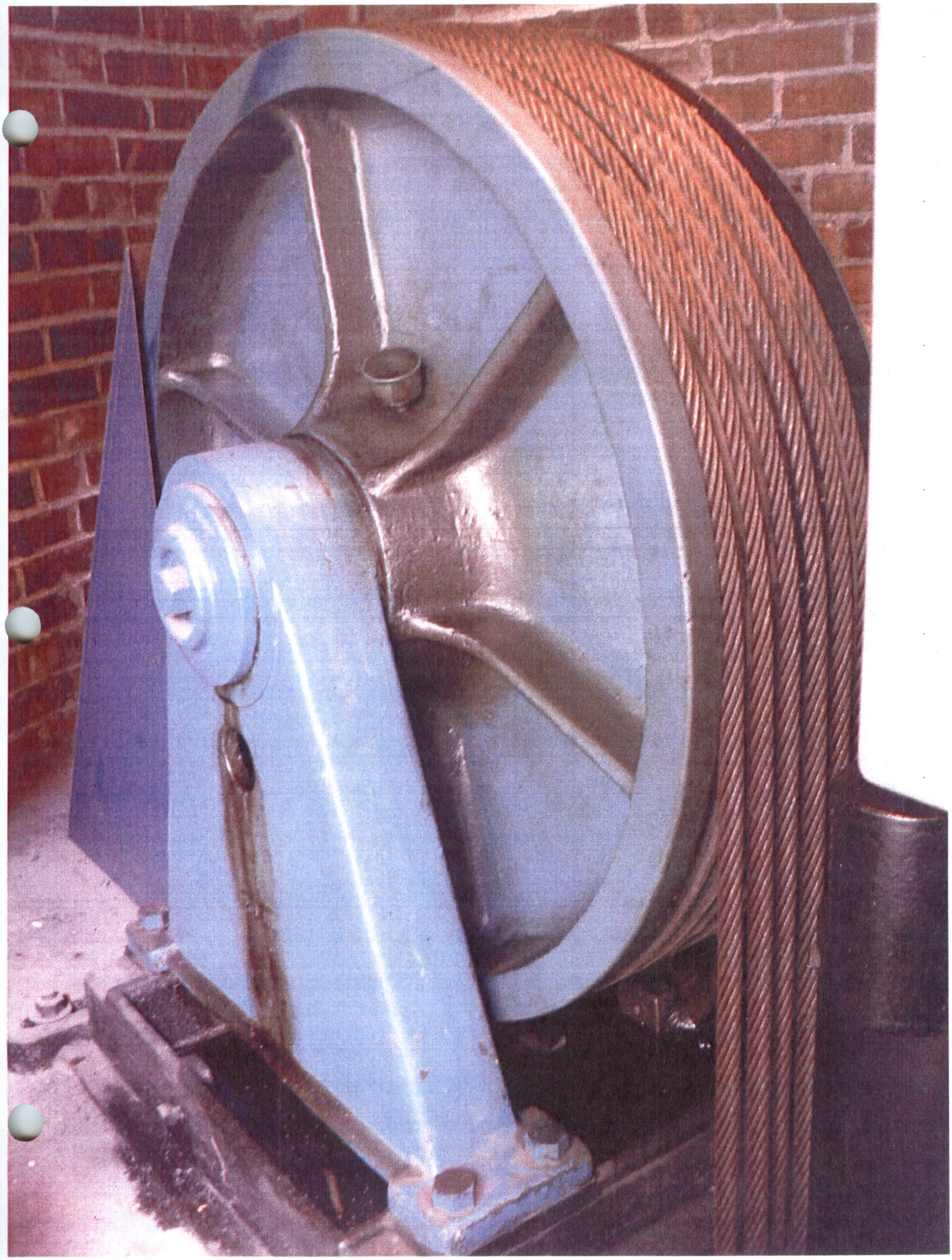


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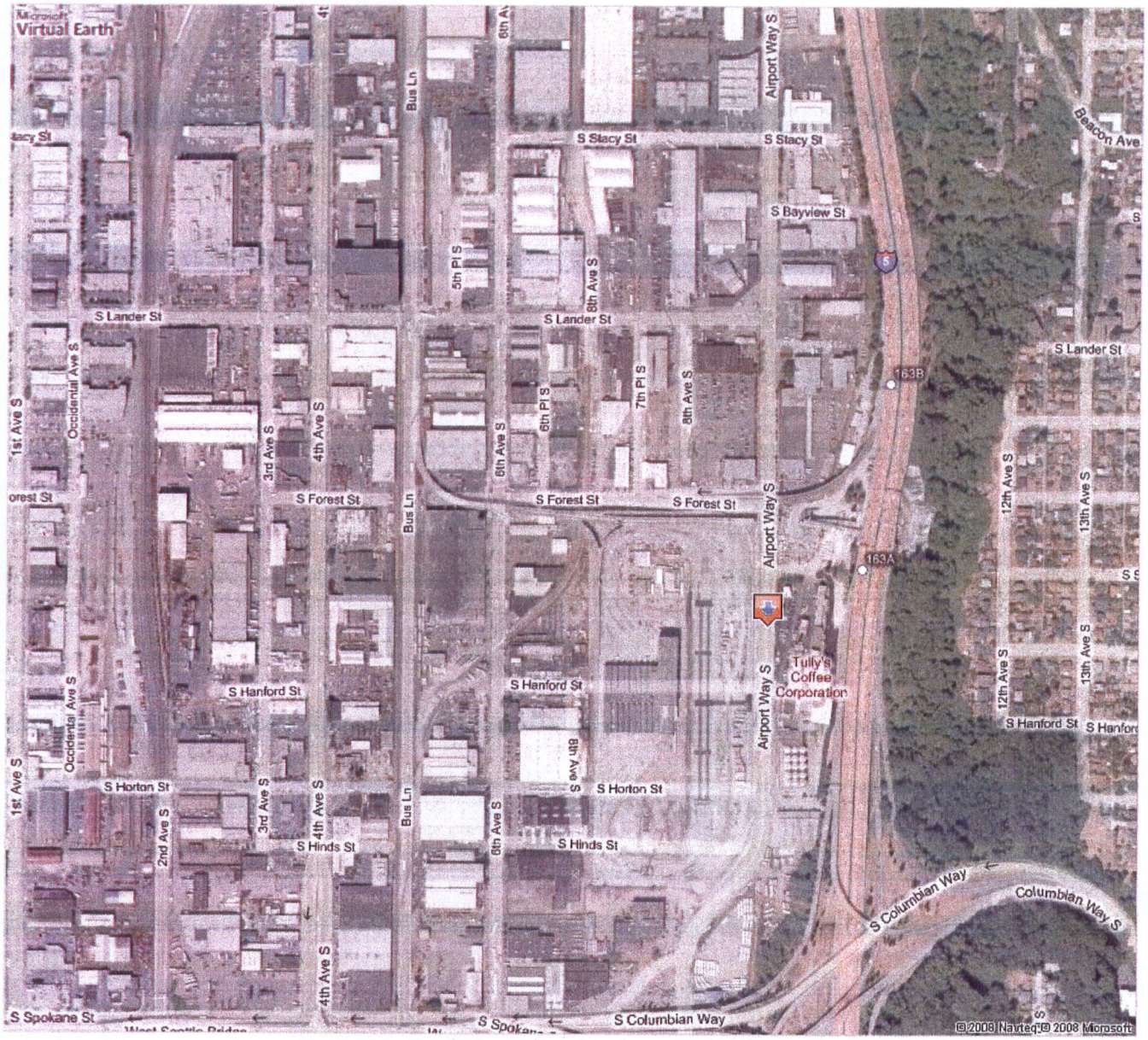
OUTFALL TO STREAM DUMP NO POLLUTANTS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Tully's Coffee Corporation
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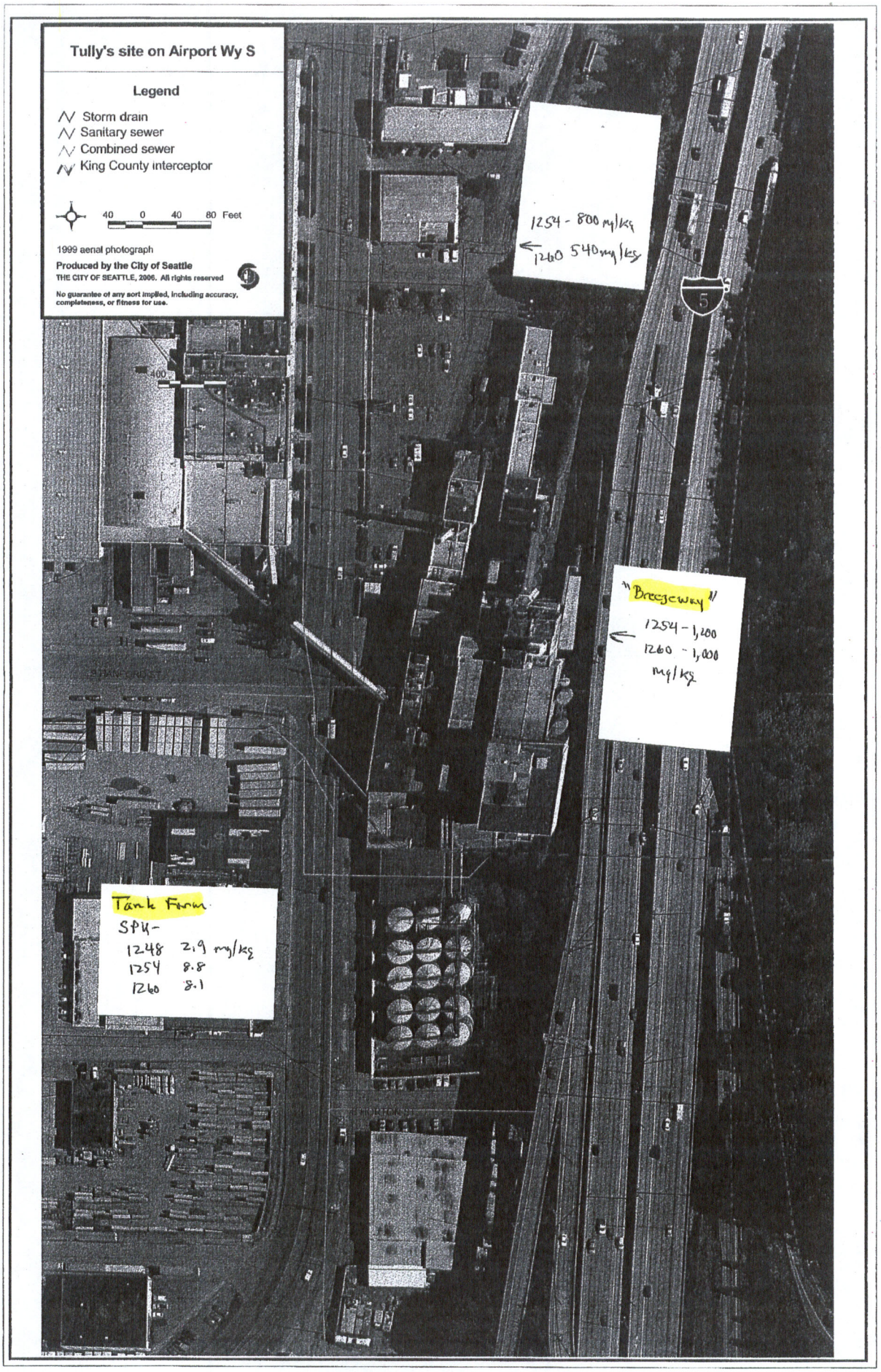
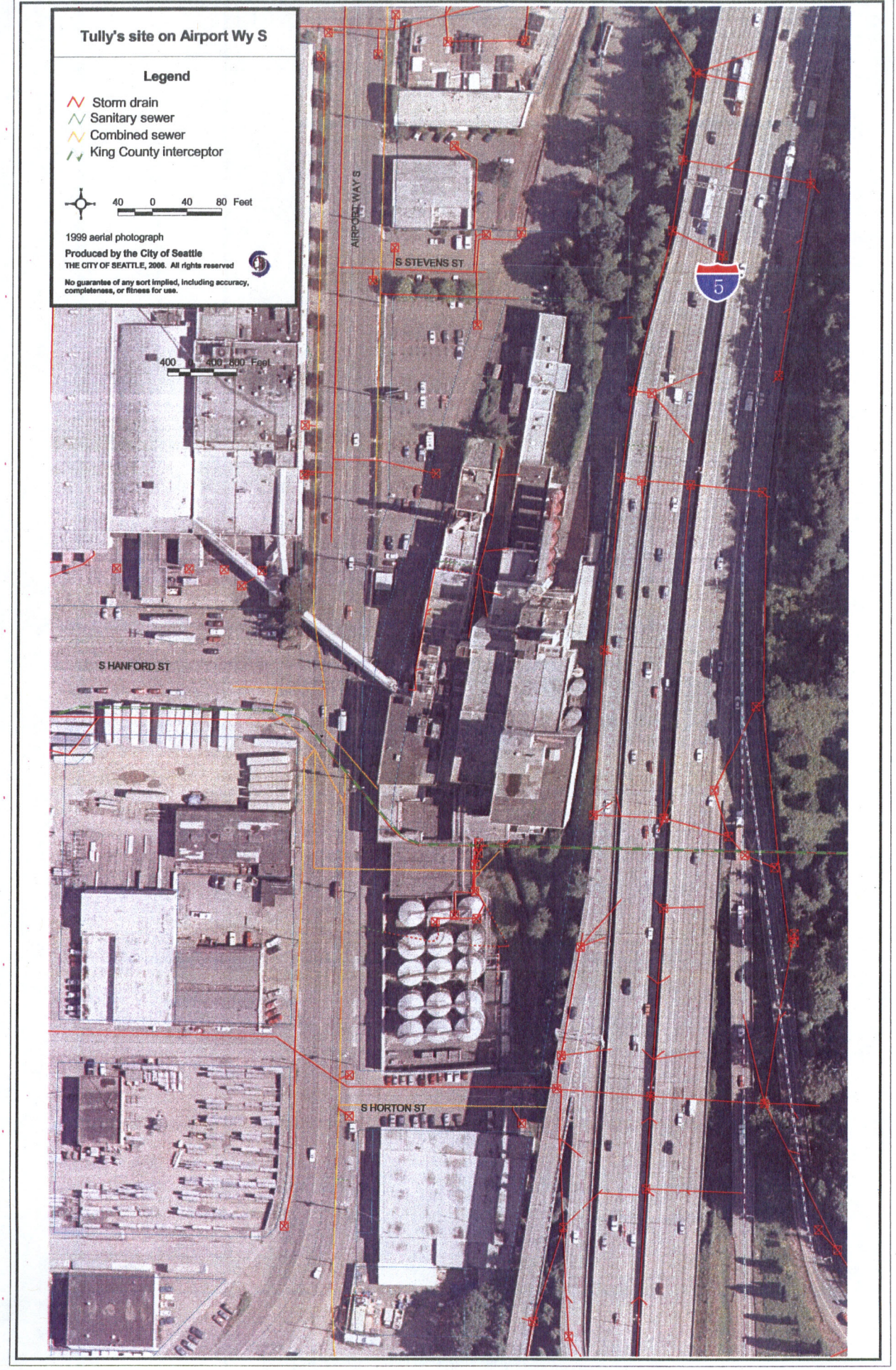

Tully's site on Airport Wy S
Legend
Storm drain
Sanitary sewer
Combined sewer
King County interceptor
40 0 40 80 Feet
1999 aerial photograph
Produced by the City of Seattle
THE CITY OF SEATTLE, 2006. All rights reserved
No guarantee of any sort implied, including accuracy, completeness, or fitness for use.
1254 - 800 mg/kg
1260 540 mg/kg
5
400
"Breezeway"
1254 - 1,200
1260 - 1,000
mg/kg
Tank Farm
SPH-
1248 2.9 mg/kg
1254 8.8
1260 8.1


Tully's site on Airport Wy S
Legend
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1999 aerial photograph
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THE CITY OF SEATTLE, 2006. All rights reserved
No guarantee of any sort implied, including accuracy, completeness, or fitness for use.
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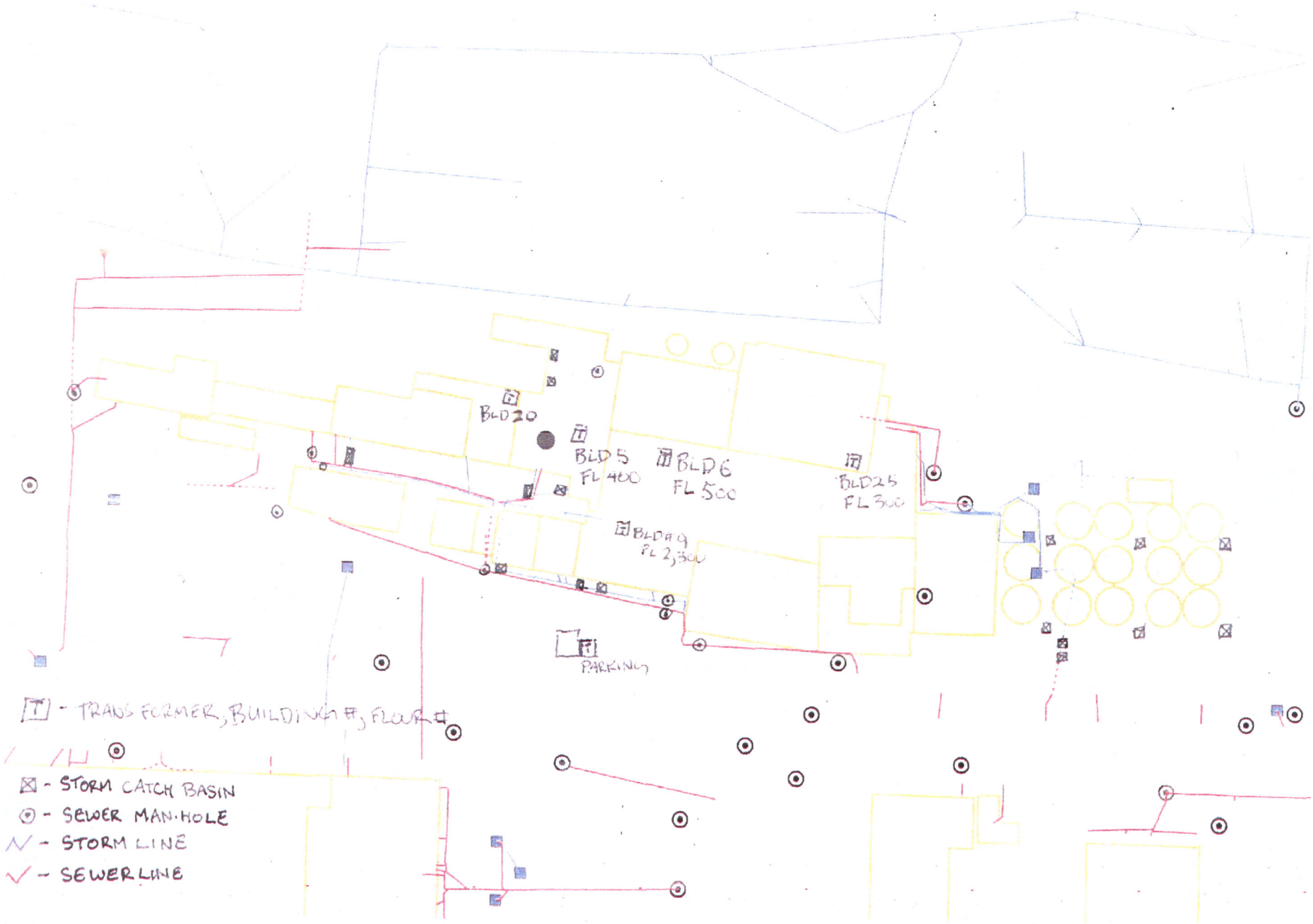
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BLD 6
FL 500
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FL 300
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- STORM LINE
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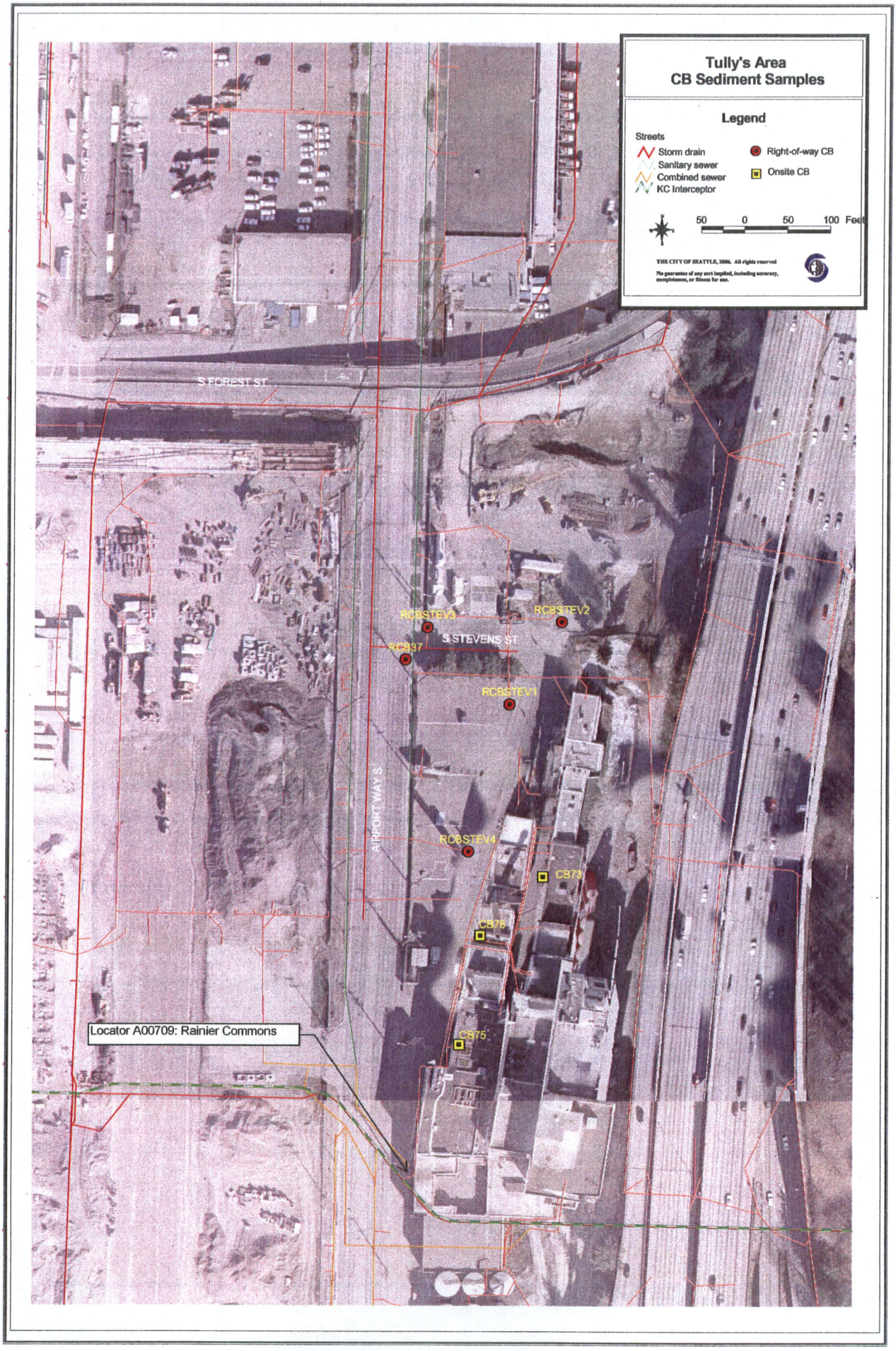
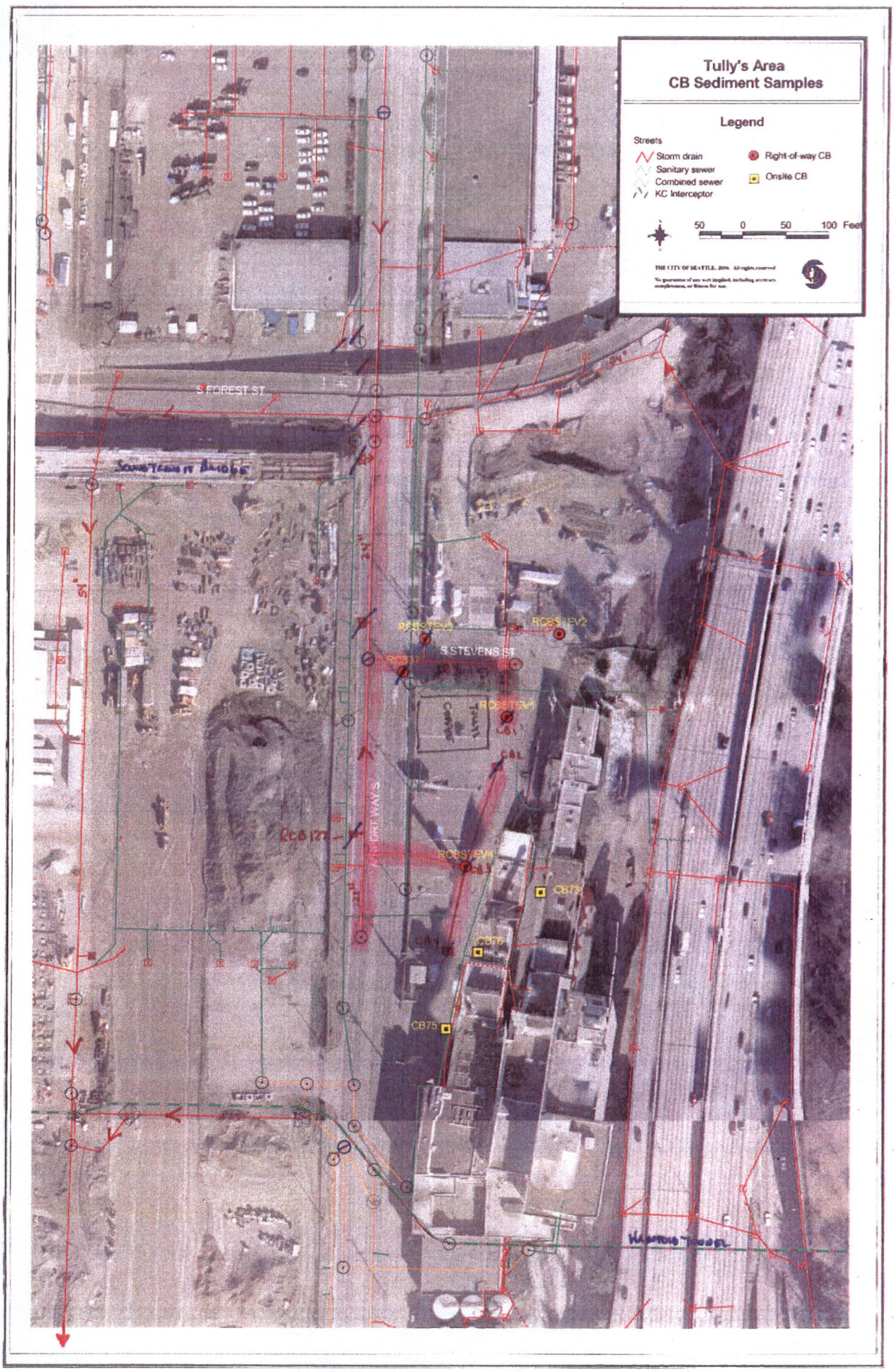

Tully's Area
CB Sediment Samples
Legend
Streets
Storm drain
Sanitary sewer
Combined sewer
KC Interceptor
Right-of-way CB
Onsite CB
50 0 50 100 Feet
THE CITY OF SEATTLE, 2006. All rights reserved
No guarantee of any sort implied, including accuracy, completeness, or fitness for use.
S FOREST ST
RCBSTEV3
RCBSTEV2
S STEVENS ST
RCB37
RCBSTEV1
AIRPORT WAY S
RCBSTEV4
CB77
CB76
CB75
Locator A00709: Rainier Commons



— Cleaned 1/10/08 By Brand

CB1 — CB4 Sampled 1/09

C. Brand 1/10 - 11/08

Areas for Lease at 3100 Airport Way South

Building 15 Level 200 – 4,500 square feet
Polished wood floor, Brick walls, 12' ceiling (10'6" to bottom of beam), East & West factory fenestration (windows), Dual egress, Place of gathering potential 200 person occupancy, 4 men's/4 women's bathroom, 110v & 220v power, Isolated occupancy from other structures (only Tully's Bean stock room below).

Building 14/18 Level 200 – 10,000 square feet
All concrete construction w/ some brick walls, 14' ceiling, 4' elevated West outdoor stage, Dual egress +, Place of gathering potential for 900 person occupancy, 4 men's/4 women's bathroom, 110v, 208y\v, 480v power, ideal location for Restaurant / Community Center

Building 7 Level 400 & 500 – 9,000+ square feet
2 – 4,500 square foot floors - All concrete construction w/ some brick walls, 14' & 16' ceilings, South & west 9'x9' window per bay, 110v, 208y\v power, "B" office Occupancy ideal for production studios.

Building 4, 5 & 5a Levels 200 & 600 – 10,000+ square feet
2 – 4,500 square foot floors - All concrete construction w/ some brick walls, 14' & 16' ceilings, South & west 9'x9' window per bay, 110v, 208y\v power, "B" office Occupancy ideal for production studios.

The Retail Block - Building 10,11,12,13 & 23 Level 200 – 8,000 square feet
All historic brick , 14' to 25' ceilings, Storefront Office/Commercial Occupancy,, Dual, 110v, 208y\v power, ideal location for boutique shop, arts production shop (such as glass

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE: 3/24/09	INSPECTION NO.: F12361	DAILY SEQ. NO.	Rainer Commons, LLC ~~Rainer Development, LLC~~
2. INSPECTOR'S ADDRESS: US EPA - Oregon operations office. 805 SW Broadway, Suite 500 Portland, Oregon 97205			4. FACILITY ADDRESS: 3100 Airport Way South Seattle, Washington 98134

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE		RECIPIENT'S SIGNATURE	
NAME: Bruce Long		NAME: Eitan Alon	
TITLE: EPS	DATE SIGNED: 3/24/09	TITLE: Owners Rep.	DATE SIGNED: 3/24/09

*U.S. GPO: 2000-468-422/45055

EPA

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT
TSCA INSPECTION CONFIDENTIALITY NOTICE

1. INVESTIGATION IDENTIFICATION			4. FACILITY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	Rainier Commons, LLC ~~Ariel Development, LLC~~
3/24/09	I-12361		
2. INSPECTOR'S NAME			5. ADDRESS
Bruce Long			3100 Airport Way S, Seattle, Washington
3. INSPECTOR'S ADDRESS			6. ~~NAME OF CHIEF EXECUTIVE OFFICER~~
USEPA - Oregon operations office 805 SW Broadway, Suite 500 Portland, Oregon 97205			Eitan Alon - Owner's Rep.
			7. TITLE

For internal EPA use. Copies may be provided to recipient as acknowledgment of this notice.

TO ASSERT A TSCA CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during the inspection of the facility cited above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR, Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the EPA Administrator determines that the data is entitled to confidential treatment, or may be withheld from release under other exceptions of FOIA.

or all information collected by EPA during the inspection may be claimed as fidential if it relates to trade secrets, commercial, or financial matters that you consider to be confidential business information (CBI). If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of CBI. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information claimed as CBI.

A CBI claim may be asserted at any time prior to, during, or after the information is collected. This notice was developed by EPA to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationary or by making the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this notice. The inspector will be glad to answer any questions you may have regarding EPA's CBI procedures.

While you may claim any collected information or sample as CBI, such claims are not likely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies), or by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is CBI.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your company within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive CBI treatment.

The statement from the Chief Executive Officer should be addressed to:

US EPA - Region 10 Attn: Dan Duncan - Mail Stop 980
1200 Sixth Ave
Seattle, Washington 98101

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this notice. Claims may be made at any time after the inspection, but the inspection data will not be entered into the TSCA/CBI security system until an official confidentiality claim is made. The data will be handled under EPA's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE I acknowledge receipt of this notice:		If there is no one on the premise who is authorized to make CBI claims for this facility, a copy of this notice and other inspection materials will be sent to the company's Chief Executive Officer. If there is another official who should also receive this information, please designate below.
SIGNATURE		NAME
NAME	Eitan Alon	TITLE
TLE	DATE SIGNED	ADDRESS
Owner's Rep.	3/24/09	

EPA FORM 7740-4 (Revise July 1997) PREVIOUS VERSIONS ARE OBSOLETE

FILE COPY

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	Rainer Commons, LLC ~~Axiel Development, LLC~~
3/24/2009	F12361		
3. INSPECTOR ADDRESS USEPA - Oregon operations office 805 SW Broadway, Suite 500 Portland, Oregon 97205			4. COMPANY ADDRESS 3100 Airport Way South Seattle, Washington 98134

For internal EPA use. Copies of this form may be provided to recipient as acknowledgment of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
(1)	Samples 1 - oil from elevator Building No. 5 1 - Paint from wall Building No. 13 1 - Paint from ground Building No. 13 1 - Soils from SP-1
(2)	Drawing of Catch Basins & Sumps One page
(3)	Will inventory electrical items inside cabinet building No 9 by 30 days from today

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☒

INSPECTOR SIGNATURE	CLAIMANT SIGNATURE
NAME: Bruce Long	NAME: Eitan Alon
TITLE: EPS	DATE SIGNED
TITLE: Owner's Rep.	DATE SIGNED: 3/24/09

EPA FORM 7740-1 (REVISED JULY 1996) CORE TSCA --- PREVIOUS VERSIONS ARE OBSOLETE

☆ U.S. GPO: 2001—617-481

INSPECTOR'S COPY

Corporations: Registration Detail

Corporations Division - Registration Data Search

RAINIER COMMONS LLC

UBI Number	602294383
Category	LLC
Profit/Nonprofit	Profit
Active/Inactive	Active
State Of Incorporation	WA
Date of Incorporation	05/09/2003
Expiration Date	05/31/2009
Dissolution Date	
Registered Agent Information	
Agent Name	RSC CORPORATION
Address	1201 3RD AVE STE 3400
City	SEATTLE
State	WA
ZIP	981013034
Special Address Information	
Address	
City	

State

Zip

Governing Persons

Title	Name	Address
Member	GOLDFARB , BRETT	SEATTLE , WA
Member	HAZAN , HERZEL	SEATTLE , WA
Member	MIZRAHI , SHIMON	SEATTLE , WA
Member	HAZAN , ELAN	SEATTLE , WA
Member	MIZRAHI , ITZIK	SEATTLE , WA
Member	ENTERPRISES LLC , MICHEAL J GOLDFARB	SEATTLE , WA
Member	OHAYAN , TAMIR	SEATTLE , WA

« Return to Search List

You can find this information at: http://www.secstate.wa.gov/corps/search_detail.aspx?ubi=602294383

Corporations: Registration Detail

Corporations Division - Registration Data Search

ARIEL DEVELOPMENT LLC

UBI Number	602620432
Category	LLC
Profit/Nonprofit	Profit
Active/Inactive	Active
State Of Incorporation	WA
Date of Incorporation	06/06/2006
Expiration Date	06/30/2009
Dissolution Date	
Registered Agent Information	
Agent Name	RSC CORPORATION
Address	1201 3RD AVE STE 3400
City	SEATTLE
State	WA
ZIP	981013034
Special Address Information	
Address	
City	

State

Zip

Governing Persons

Title	Name	Address
Manager	HAZAN , HERZEL	3317 3RD AVENUE SOUTH SUITE 200 SEATTLE , WA
Manager	MIZRAHI , SHIMON	3317 3RD AVENUE SOUTH SUITE 200 SEATTLE , WA

« Return to Search List

You can find this information at: http://www.secstate.wa.gov/corps/search_detail.aspx?ubi=602620432

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 LABORATORY
7411 Beach Dr. East
Port Orchard, Washington 98366

MEMORANDUM

SUBJECT: Data Release for PCB Aroclor Results from the Region 10 USEPA Laboratory

PROJECT NAME: Rainier Commons

PROJECT CODE: OOO-138A

FROM: Gerald Dodo, Supervisory Chemist
Office of Environmental Assessment
USEPA Region 10 Laboratory

TO: Bruce Long
Office of Compliance and Enforcement
USEPA Region 10

I have authorized release of this data package. Attached you will find the PCB Aroclor analysis results for the Rainier Commons samples collected on 3/24/09. Contact me for further information regarding the attached data, 360-871-8728.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 LABORATORY
7411 Beach Dr. East
Port Orchard, Washington 98366

QUALITY ASSURANCE MEMORANDUM FOR ORGANIC CHEMICAL ANALYSES

Date: May 6, 2009

To: Bruce Long, Project Manager
Office of Compliance and Enforcement, USEPA Region 10

From: Gerald Dodo, Supervisory Chemist
Office of Environmental Assessment, USEPA Region 10 Laboratory

Subject: Quality Assurance Review for the Rainier Commons Project
Project Code: OOO-138A
Account Code: 0910B10P501E50C

The following is a quality assurance review of the data for PCB Aroclor analysis of a wipe and solids samples from the Rainier Commons project. The analyses were performed by EPA chemists at the US EPA Region 10 Laboratory in Port Orchard, WA, following US EPA Laboratory guidelines.

This review covers the following samples:

09124300	09124301	09124302	09124303

Data Qualifications

Comments below refer to the quality control specifications outlined in the Laboratory's current Quality Assurance Manual, Standard Operating Procedures (SOPs) and the Quality Assurance Project Plan (QAPP). No excursions were required from the method Standard Operating Procedure.

The quality control measures which did not meet Laboratory criteria are annotated in the title of each affected subsection with **"Laboratory/QAPP Criteria Not Met."**

For those tests for which the USEPA Region 10 Laboratory has been accredited by the National Environmental Laboratory Accreditation Conference (NELAC), all requirements of the current NELAC Standard have been met. The conclusions presented herein are based on the information provided for the review.

Sample Transport and Receipt

Upon sample receipt, no conditions were noted that would affect data quality.

Sample Holding Times

The concentration of an analyte in a sample or extract of a sample may increase or decrease over time depending on the nature of the analyte. For this reason, holding time limits are recommended for samples and extracts. The samples were extracted within 14 days of collection. Extracts were analyzed within 40 days of preparation. No qualifiers were applied based on holding times.

Sample Preparation

Samples were prepared according to the method outlined in USEPA Method 3580A and standard operating procedure (SOP) OR_C082 for PCB Aroclors in oil and wipes. The solid samples consisted of paint chip material which was extracted with solvent. No qualification of the data was required based on sample preparation.

Initial Calibration and Calibration Verification

The calibration functions generated for the initial calibration met method and SOP criteria. The Minimum Reporting Level (MRL) is the lowest point for which the calculated value tests within laboratory specified criteria. Calibration verification checks met criteria. No qualification was required based on calibration or calibration verification.

Laboratory Control Samples

Data for laboratory control samples/laboratory control sample duplicates (LCS/LCSD) are generated to provide information on the accuracy and precision of the analytical method and the laboratory performance. The LCS/LCSD recoveries were within the QAPP criteria.

Blank Analysis

Method blanks were analyzed with the sample preparation batch to evaluate the potential for laboratory contamination and effects on the sample results. PCB Aroclors were not detected above the reporting limit in the blanks.

Surrogate Spikes

Surrogate recoveries are used to help in the evaluation of laboratory performance on individual samples. The surrogate recoveries met the individual surrogate criteria of 50-150% except for sample 09124300. This sample resulted with <50% surrogate recovery and the reported results were qualified J/UJ. Surrogate recoveries were not determined where large dilutions were necessary for analysis. These are qualified as "NA."

9. Matrix Spike/Matrix Spike Duplicate (MS/MSD)

An MS/MSD analysis was performed using sample 09124303 (S1/S2). The recoveries were not measurable due to the spiking level being too low relative to the native concentration.

10. Compound Quantitation

The initial calibration functions were used for calculations. Reported quantitation limits were based on the initial calibration standards and sample size used for the analysis. All results for analytes that are not detected are assigned the value of the quantitation limits or a value based on the interference of a detected, overlapping Aroclor or background interference and the 'U' qualifier attached.

The final results are slightly different from the preliminary values provided earlier.

11. Identification

Aroclors detected in samples were judged to be acceptable with regard to chromatographic pattern matching with standards.

12. Data Qualifiers

Below are the definitions for the codes used when qualifying data from these analyses. When more than one quality issue was involved, the most restrictive qualifier has been attached to the data.

Qualifier/ Remark Code		Definition (Codes Assigned to Values)
NA	-	Not applicable.
U	-	The analyte was not detected at or above the reported value.
J	-	The identification of the analyte is acceptable; however the reported value is an estimate.
UJ	-	The analyte was not detected at or above the reported value. The reported value is an estimate.

The usefulness of qualified data should be treated according to the severity of the qualifier in light of the project's data quality objectives. Should questions arise regarding the data, contact Steve Reimer at the Region 10 Laboratory, phone number (360) 871-8718.

13. Definitions

Accuracy - the degree of conformity of a measured or calculated quantity to its actual value.

Duplicate Analysis – when a duplicate of a sample (DS), a matrix spike (MSD), or a laboratory control sample (LCSD) is analyzed, it is possible to use the comparison of the results in terms of relative percent difference (RPD) to calculate precision.

Internal standards - Compounds used to help evaluate instrument analytical performance for individual samples. Internal standards provide an instrument response for reference to accurately

quantify the analytes for all associated instrumental analyses.

Laboratory Control Sample (LCS) - a clean matrix spiked with known quantities of analytes. The LCS is processed with samples through every step of preparation and analysis. Measuring percent recovery of each analyte in the LCS provides a measurement of accuracy for the analyte in the project samples. A laboratory control sample is prepared and analyzed at a frequency no less than one for every 20 project samples.

Matrix Spike/Matrix Spike Duplicate (MS/MSD) - Sample analyses performed to provide information about the effect of the sample matrix on analyte recovery and measurement within the project samples. To create the MS/MSD, a project sample is spiked with known quantities of analyte(s) and the percent recovery of the of analyte(s) is (are) determined.

Method Blank- An analytical control that is carried through the entire analytical procedure. The method blank is used to define the level of laboratory background and reagent contamination. A method blank is prepared and analyzed for every batch of samples at a minimum frequency of one per every 20 samples. To produce unqualified data, the result of the method blank analysis is required to be less than the MRL and less than 5 times the amount of analyte found in any project sample.

Minimum Reporting Level (MRL) - the smallest measured concentration of a substance that can be reliably measured using a given analytical method.

Peak Integrations - The output of many analytical instruments is a peak which represents the quantity of analyte in the sample. The instrument automatically integrates the peak area to provide the concentration of the analyte; however, sometimes these peaks need to be manually integrated by the analyst.

Precision – the degree of mutual agreement or repeatability among a series of individual results.

Reference materials – Samples with analyte values that are homogeneous and well established. This allows the reference material to be used to assess the accuracy of the measurement method.

Relative Percent Difference – The difference between two sample results divided by their mean and expressed as a percentage.

Surrogate Spikes - usually isotopically labeled versions of analytes of concern or compounds not typically found in the environment. They are used to help evaluate laboratory preparation and analysis performance for individual samples. The surrogate spike differs from the LCS (above) in that it is placed in each project sample to assess preparation and analytical efficiency.

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	3/24/09	**13:30:00**
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Swab	
Project Officer:	BRUCE LONG	**Sample Number:**	09124300	
Account Code:	0910B10P501E50C	**Type:**	Reg sample	
Station Description:	OIL FROM ELEVATOR METER			

ORG

Parameter : Polychlorinated Biphenyl — Wet Weight — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/14/2009
Prep Method : 3580A 3580A Serial Dilution — Prep Date : 4/2/2009

			Result	Units	Qlfr
Analytes(s):	12674112	PCB-1016	0.25	ug	UJ
	11104282	PCB-1221	0.25	ug	UJ
	11141165	PCB-1232	0.50	ug	UJ
	53469219	PCB-1242	0.25	ug	UJ
	12672296	PCB-1248	0.25	ug	UJ
	11097691	**PCB-1254**	**9.3**	**ug**	**J**
	11096825	PCB-1260	0.25	ug	UJ
Surrogate(s :	*2051243	Decachlorobiphenyl	43	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	3/24/09	**14:30:00**
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid	
Project Officer:	BRUCE LONG	**Sample Number:**	09124301	
Account Code:	0910B10P501E50C	**Type:**	Reg sample	
Station Description:	PAINT FROM BUILDING 13 WALL			

ORG

Parameter : Polychlorinated Biphenyl — Wet Weight — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/17/2009
Prep Method : 3580A 3580A Serial Dilution — Prep Date : 4/2/2009

			Result	Units	Qlfr
Analytes(s):	12674112	PCB-1016	4.9	mg/kg	U
	11104282	PCB-1221	4.9	mg/kg	U
	11141165	PCB-1232	9.9	mg/kg	U
	53469219	PCB-1242	4.9	mg/kg	U
	12672296	PCB-1248	4.9	mg/kg	U
	11097691	**PCB-1254**	**360**	**mg/kg**	
	11096825	**PCB-1260**	**300**	**mg/kg**	
Surrogate(s :	*2051243	Decachlorobiphenyl	79	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid
Project Officer:	BRUCE LONG	**Sample Number:**	09124301
Account Code:	0910B10P501E50C	**Type:**	Duplicate
Station Description:			

ORG

Parameter : Polychlorinated Biphenyl — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/17/2009
Prep Method : 3580A 3580A Serial Dilution — Prep Date : 4/2/2009

			Result	Units	Qlfr
Analytes(s):	12674112	PCB-1016	4.9	mg/kg	U
	11104282	PCB-1221	4.9	mg/kg	U
	11141165	PCB-1232	9.8	mg/kg	U
	53469219	PCB-1242	4.9	mg/kg	U
	12672296	PCB-1248	4.9	mg/kg	U
	11097691	**PCB-1254**	**420**	**mg/kg**	
	11096825	**PCB-1260**	**360**	**mg/kg**	
Surrogate(s :	*2051243	Decachlorobiphenyl	83	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	3/24/09	**14:35:00**
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid	
Project Officer:	BRUCE LONG	**Sample Number:**	09124302	
Account Code:	0910B10P501E50C	**Type:**	Reg sample	
Station Description:	PAINT ON GROUND BY CB-02			

			Result	Units	Qlfr
ORG					
Parameter	: Polychlorinated Biphenyl		Wet Weight	Container ID :	N1
Method	: 8082	Polychlorinated Biphenyls (PCBs/congeners) by GC		Analysis Date :	4/17/2009
Prep Method	: 3580A	3580A Serial Dilution		Prep Date :	4/2/2009
Analytes(s):	*2051243	Decachlorobiphenyl			NA
	12674112	PCB-1016	97	mg/kg	U
	11104282	PCB-1221	97	mg/kg	U
	11141165	PCB-1232	193	mg/kg	U
	53469219	PCB-1242	97	mg/kg	U
	12672296	PCB-1248	97	mg/kg	U
	11097691	**PCB-1254**	**6100**	**mg/kg**	
	11096825	**PCB-1260**	**3900**	**mg/kg**	

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid
Project Officer:	BRUCE LONG	**Sample Number:**	09124302
Account Code:	0910B10P501E50C	**Type:**	Duplicate
Station Description:			

		Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/17/2009
Prep Method : 3580A 3580A Serial Dilution — Prep Date : 4/2/2009

Analytes(s):	*2051243	Decachlorobiphenyl			NA
	12674112	PCB-1016	97	mg/kg	U
	11104282	PCB-1221	97	mg/kg	U
	11141165	PCB-1232	193	mg/kg	U
	53469219	PCB-1242	97	mg/kg	U
	12672296	PCB-1248	97	mg/kg	U
	11097691	**PCB-1254**	**6200**	**mg/kg**	
	11096825	**PCB-1260**	**4000**	**mg/kg**	

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	3/24/09	**14:45:00**
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid	
Project Officer:	BRUCE LONG	**Sample Number:**	09124303	
Account Code:	0910B10P501E50C	**Type:**	Reg sample	
Station Description:	SOILS FROM CB-SD1			

		Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Wet Weight — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/17/2009
Prep Method : 3550-M (MOD) Ultrasonic Extraction — Prep Date : 4/2/2009

Analytes(s):	*2051243	Decachlorobiphenyl			NA
	12674112	PCB-1016	1000	ug/kg	U
	11104282	PCB-1221	1000	ug/kg	U
	11141165	PCB-1232	2000	ug/kg	U
	53469219	PCB-1242	1000	ug/kg	U
	12672296	PCB-1248	1000	ug/kg	U
	11097691	**PCB-1254**	**52000**	**ug/kg**	
	11096825	**PCB-1260**	**46000**	**ug/kg**	

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	3/24/09	**14:45:00**
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid	
Project Officer:	BRUCE LONG	**Sample Number:**	09124303	
Account Code:	0910B10P501E50C	**Type:**	Matrix Spike	
Station Description:				

	Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Wet Weight — Container ID : N1
Method : 8082 — Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/17/2009
Prep Method : 3550-M — (MOD) Ultrasonic Extraction — Prep Date : 4/2/2009

Analytes(s):	*2051243	Decachlorobiphenyl	NA
	12674112	PCB-1016	NA
	11096825	PCB-1260	NA

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	3/24/09	**14:45:00**
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid	
Project Officer:	BRUCE LONG	**Sample Number:**	09124303	
Account Code:	0910B10P501E50C	**Type:**	Matrix Spike Dupl	
Station Description:				

	Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Wet Weight — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/17/2009
Prep Method : 3550-M (MOD) Ultrasonic Extraction — Prep Date : 4/2/2009

Analytes(s):	*2051243	Decachlorobiphenyl	NA
	12674112	PCB-1016	NA
	11096825	PCB-1260	NA

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Swab
Project Officer:	BRUCE LONG	**Sample Number:**	OBO9092B1
Account Code:	0910B10P501E50C	**Type:**	Blank
Station Description:			

ORG

Parameter : Polychlorinated Biphenyl — Container ID : 0
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/7/2009
Prep Method : 3580A 3580A Serial Dilution — Prep Date : 4/2/2009

			Result	Units	Qlfr
Analytes(s):	12674112	PCB-1016	0.50	mg/kg	U
	11104282	PCB-1221	0.50	mg/kg	U
	11141165	PCB-1232	1.0	mg/kg	U
	53469219	PCB-1242	0.50	mg/kg	U
	12672296	PCB-1248	0.50	mg/kg	U
	11097691	PCB-1254	0.50	mg/kg	U
	11096825	PCB-1260	0.50	mg/kg	U
Surrogate(s :	*2051243	Decachlorobiphenyl	94	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Swab
Project Officer:	BRUCE LONG	**Sample Number:**	OBO9092F1
Account Code:	0910B10P501E50C	**Type:**	LCS
Station Description:			

		Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Container ID : 0

Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/7/2009

Prep Method : 3580A 3580A Serial Dilution — Prep Date : 4/2/2009

Surrogate(s) :	*2051243	Decachlorobiphenyl	98	%Rec
	12674112	PCB-1016	87	%Rec
	11096825	PCB-1260	90	%Rec

OBO9092F1 LCS .

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Swab
Project Officer:	BRUCE LONG	**Sample Number:**	OBO9092F2
Account Code:	0910B10P501E50C	**Type:**	LCSD
Station Description:			

		Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Container ID : 0

Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/7/2009

Prep Method : 3580A 3580A Serial Dilution — Prep Date : 4/2/2009

Surrogate(s) :	*2051243	Decachlorobiphenyl	97	%Rec
	12674112	PCB-1016	89	%Rec
	11096825	PCB-1260	93	%Rec

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid
Project Officer:	BRUCE LONG	**Sample Number:**	OBS9092B1
Account Code:	0910B10P501E50C	**Type:**	Blank
Station Description:			

			Result	Units	Qlfr
ORG					
Parameter	: Polychlorinated Biphenyl				Container ID : 0
Method	: 8082	Polychlorinated Biphenyls (PCBs/congeners) by GC			Analysis Date : 4/7/2009
Prep Method	: 3550-M	(MOD) Ultrasonic Extraction			Prep Date : 4/2/2009
Analytes(s):	12674112	PCB-1016	10	ug/kg	U
	11104282	PCB-1221	10	ug/kg	U
	11141165	PCB-1232	20	ug/kg	U
	53469219	PCB-1242	10	ug/kg	U
	12672296	PCB-1248	10	ug/kg	U
	11097691	PCB-1254	10	ug/kg	U
	11096825	PCB-1260	10	ug/kg	U
Surrogate(s :	*2051243	Decachlorobiphenyl	98	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid
Project Officer:	BRUCE LONG	**Sample Number:**	OBS9092F1
Account Code:	0910B10P501E50C	**Type:**	LCS
Station Description:			

		Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Container ID : 0

Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/7/2009

Prep Method : 3550-M (MOD) Ultrasonic Extraction — Prep Date : 4/2/2009

Surrogate(s) :	*2051243	Decachlorobiphenyl	101	%Rec
	12674112	PCB-1016	95	%Rec
	11096825	PCB-1260	97	%Rec

OBS9092F1 LCS .

Manchester Environmental Laboratory
Report by Parameter for Project OOO-138A

Project Code:	OOO-138A	**Collected:**	
Project Name:	RAINIER COMMONS, SEATTLE, WA	**Matrix:**	Solid
Project Officer:	BRUCE LONG	**Sample Number:**	OBS9092F2
Account Code:	0910B10P501E50C	**Type:**	LCSD
Station Description:			

		Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Container ID : 0

Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 4/7/2009

Prep Method : 3550-M (MOD) Ultrasonic Extraction — Prep Date : 4/2/2009

Surrogate(s) :	*2051243	Decachlorobiphenyl	100	%Rec
	12674112	PCB-1016	95	%Rec
	11096825	PCB-1260	96	%Rec

OBS9092F2 LCSD .

SITE PHOTOGRAPHS

Phase I Environmental Site Assessment Report [2004]
Former Rainier Brewery – Seattle, Washington
Farallon PN: 338-001

Photograph 1: Facing east; view of silo brick wall in Building 5A.

Photograph 2: Facing east; view of aboveground storage tank in vestibule within Building 5A.

Photograph 3: Facing west; view of the elevator mechanical room on the roof of Building 5A.

Photograph 4: Facing west; view of the northern coffee roaster on 4th floor of Building 6.

Photograph 5: Facing northwest; view of afterburners on roof of Building 6.

Photograph 6: Facing north; view of transformers on 2nd floor of Building 7; floor drain located between the transformers.

Photograph 7: Facing southwest; view of coffee packaging machinery on 2nd floor of Building 9.

Photograph 8: Facing northeast; view of three nitrogen and five propane tanks on 2nd floor of Building 9.

Photograph 9: Facing south; view of fuel piping entering Building 13 within vault in southwestern corner of the building.

Photograph 10: Facing north; view of sealed floor drains on 1st floor of Building 14.

Photograph 11: Facing southeast; view of damaged concrete where support pillar meets ceiling on 1st floor of Building 14.

Photograph 12: Facing northeast; view of pooled oil beneath aboveground storage tank on 2nd floor of Building 14.

Photograph 13: Facing northeast; view of equipment associated with the grain and malt transfer system in Building 20.

Photograph 14: Facing north; view through hole formerly occupied by brewing kettle on 3rd floor of Building 21, and electric panel on 2nd floor.

Photograph 15: Facing northwest; view of recessed pit and floor drain on 1st floor of Building 21.

Photograph 16: Facing north; view of Glycol-mixture tank in northeastern corner on 3rd floor of Building 21.

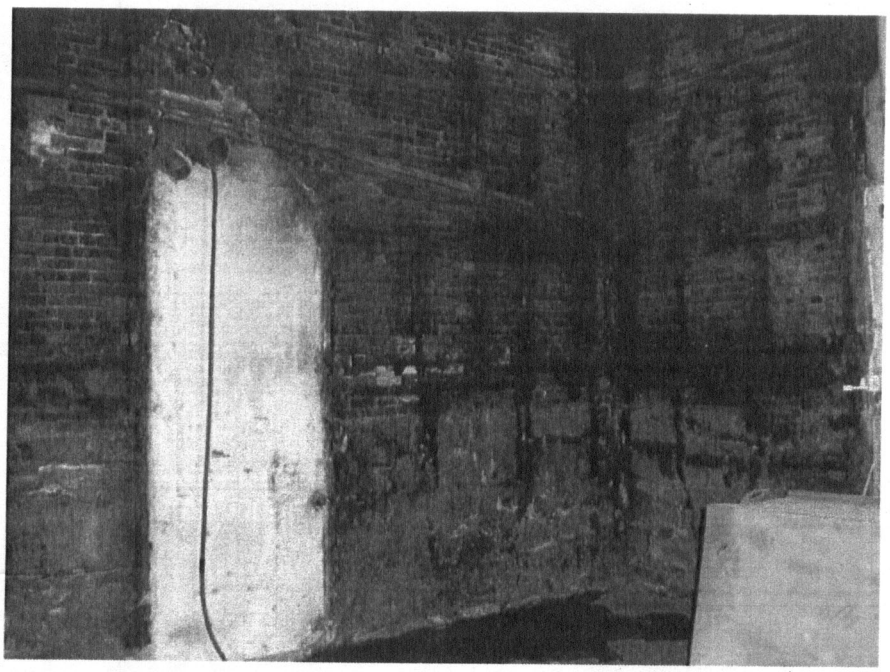
Photograph 17: Facing west; view of staining around drain on 6th floor of Building 21.

Photograph 18: Facing southeast; view of staining on wall, ceiling, and vent plenums on 2nd floor of Building 25, near rear exit.

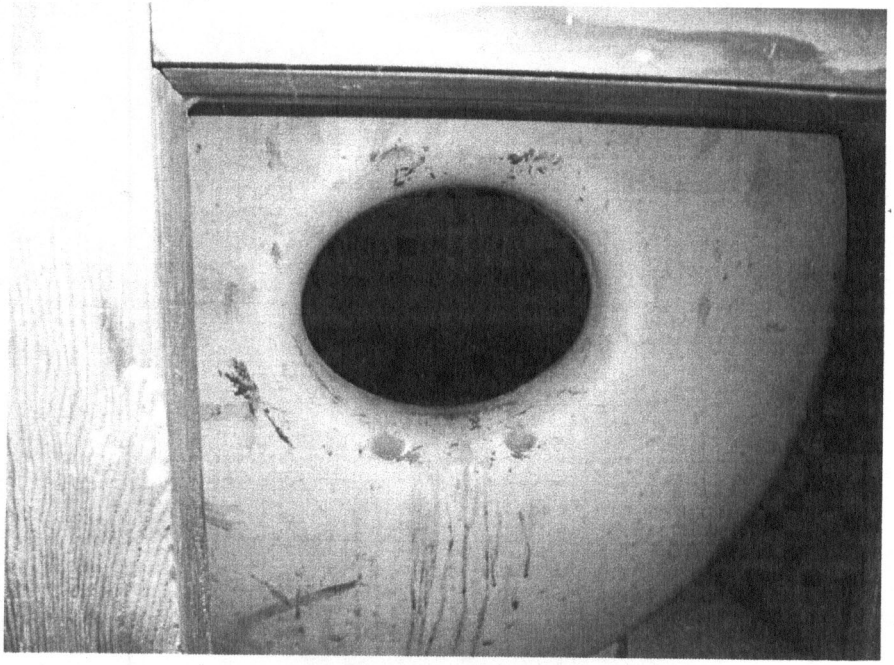
Photograph 19: Facing south; view of fermentation ASTs on 3rd floor of Building 25.

Photograph 20: Facing southeast; view of abandoned forklift in driveway beneath Building 21.

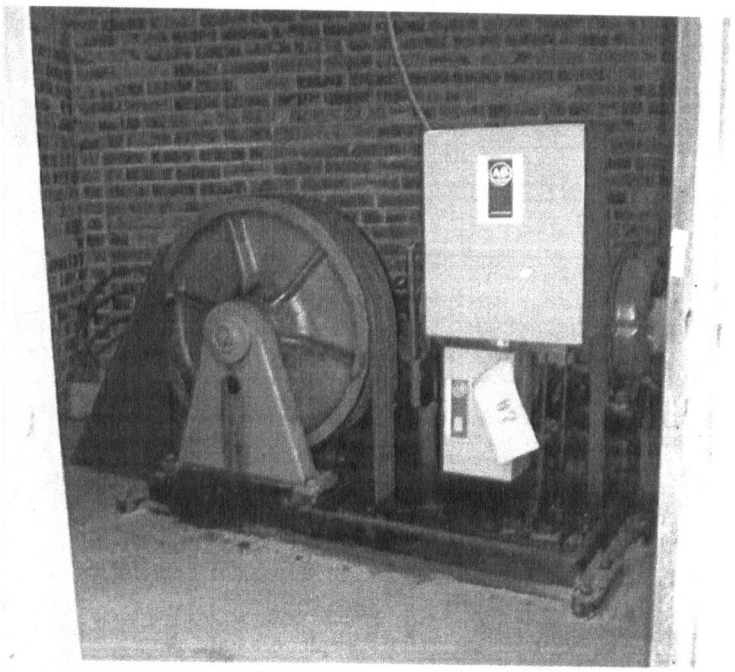
Photograph 21: Facing northwest; view of abandoned storage vessel located adjacent to the entrance to Building 20.



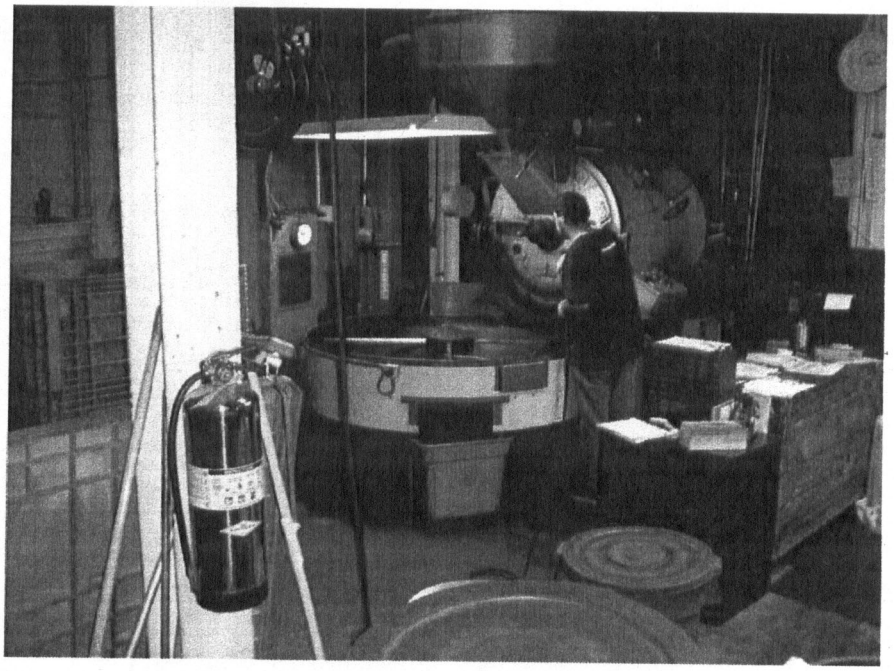
Photograph 1: Facing east; view of silo brick wall in Building 5A.



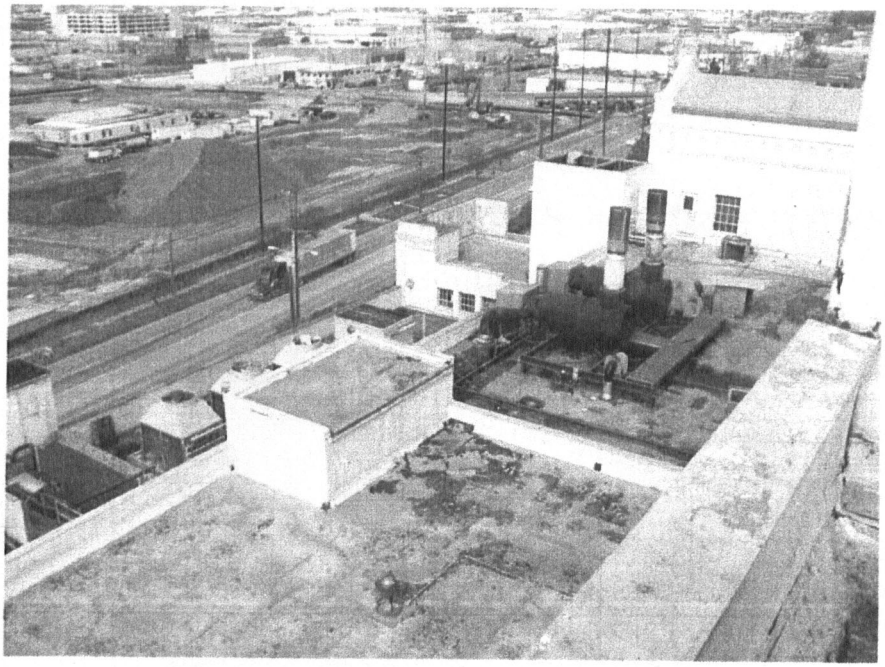
Photograph 2: Facing east; view of aboveground storage tank in vestibule within Building 5A.



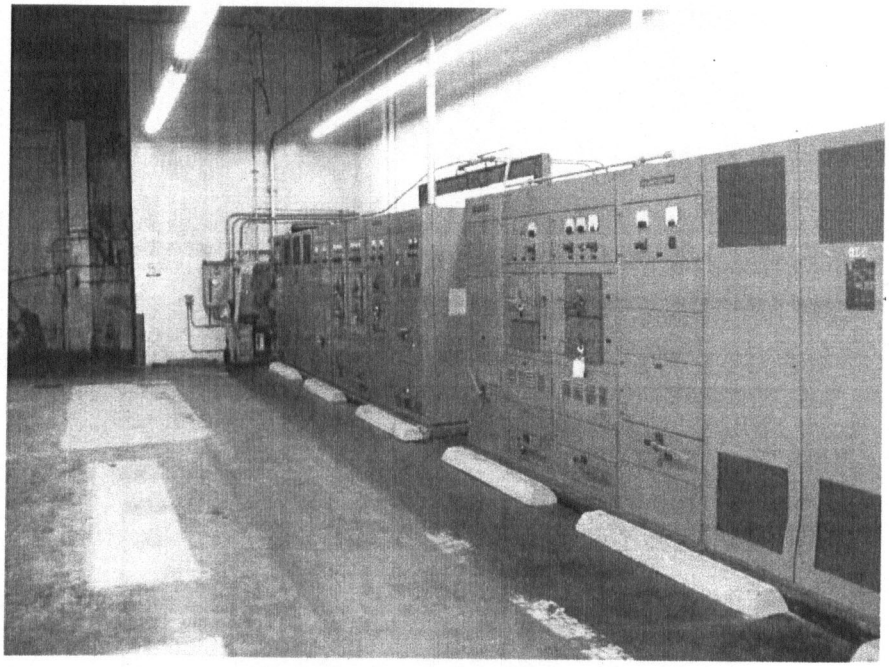
Photograph 3: Facing west; view of the elevator mechanical room on the roof of Building 5A.



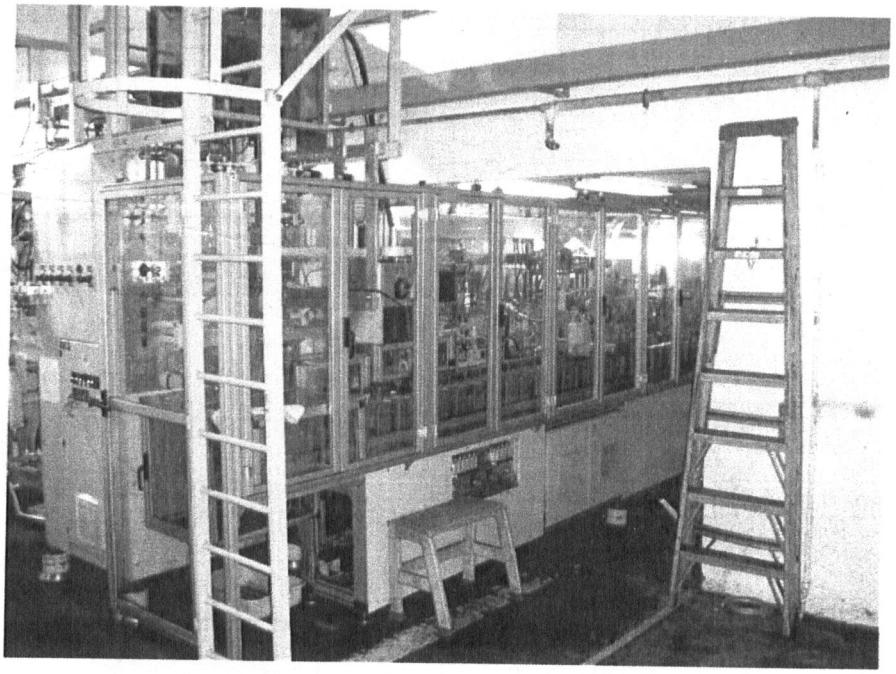
Photograph 4: Facing west; view of the northern coffee roaster on 4th floor of Building 6.



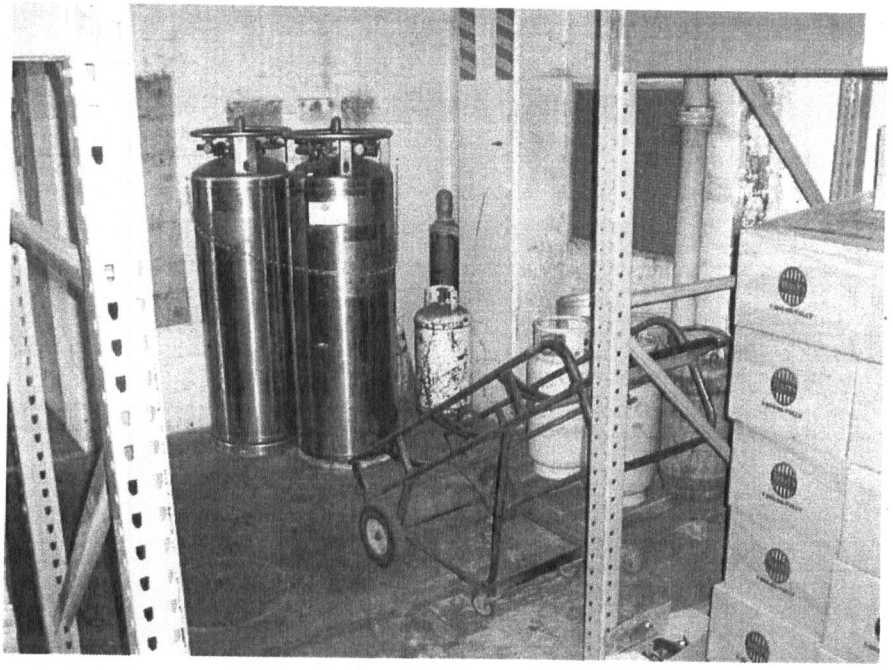
Photograph 5: Facing northwest; view of afterburners on roof of Building 6.



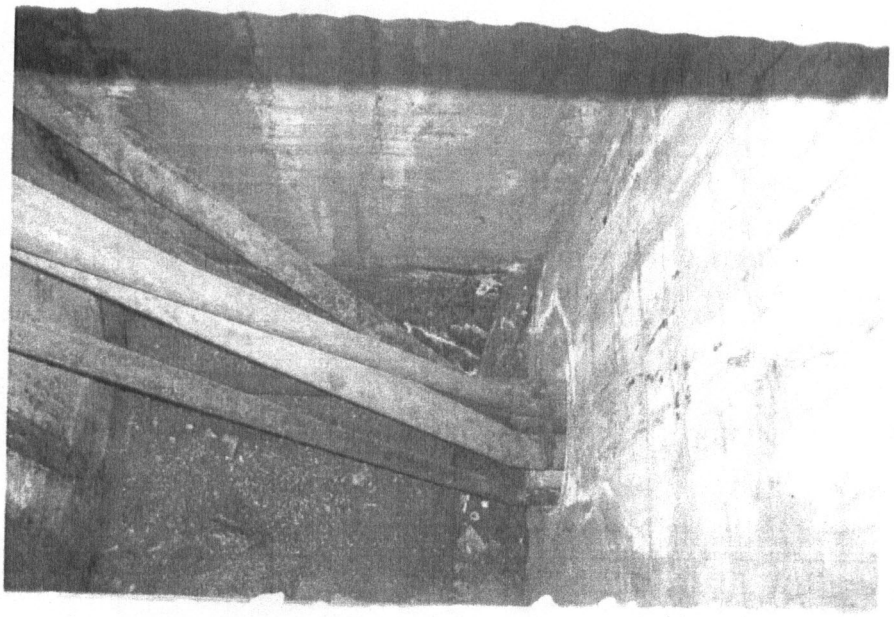
Photograph 6: Facing north; view of transformers on 2nd floor of Building 7; floor drain located between the transformers.



Photograph 7: Facing southwest; view of coffee packaging machinery on 2nd floor of Building 9.

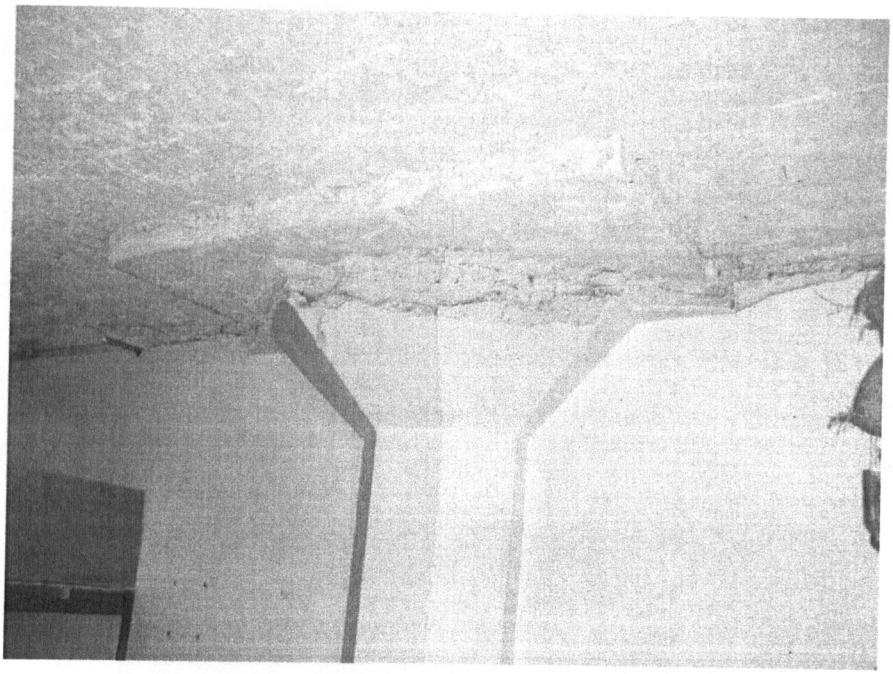


Photograph 8: Facing northeast; view of three nitrogen and five propane tanks on 2nd floor of Building 9.

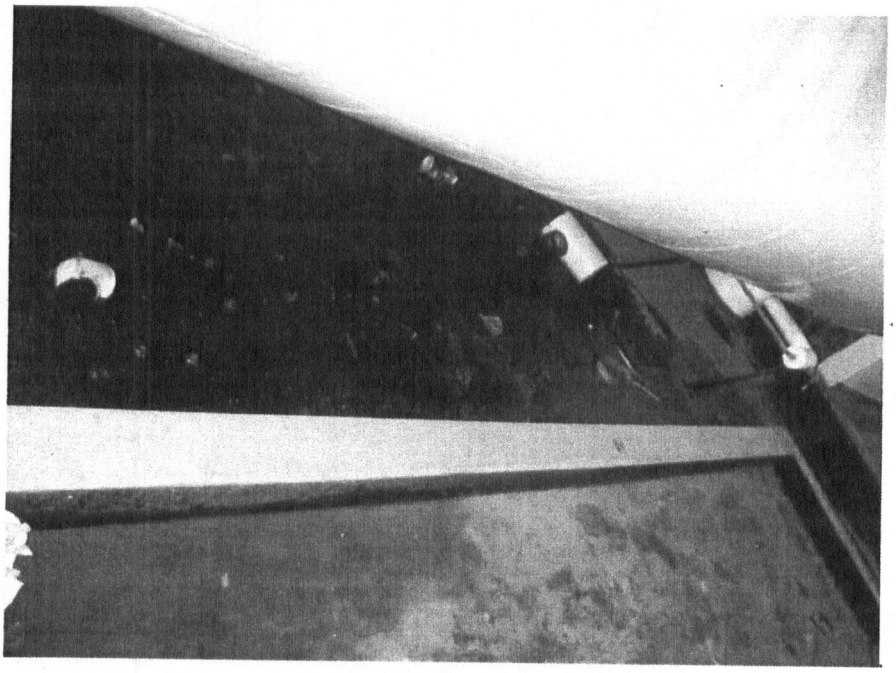


Photograph 9: Facing south; view of fuel piping entering Building 13 within vault in southwestern corner of the building.

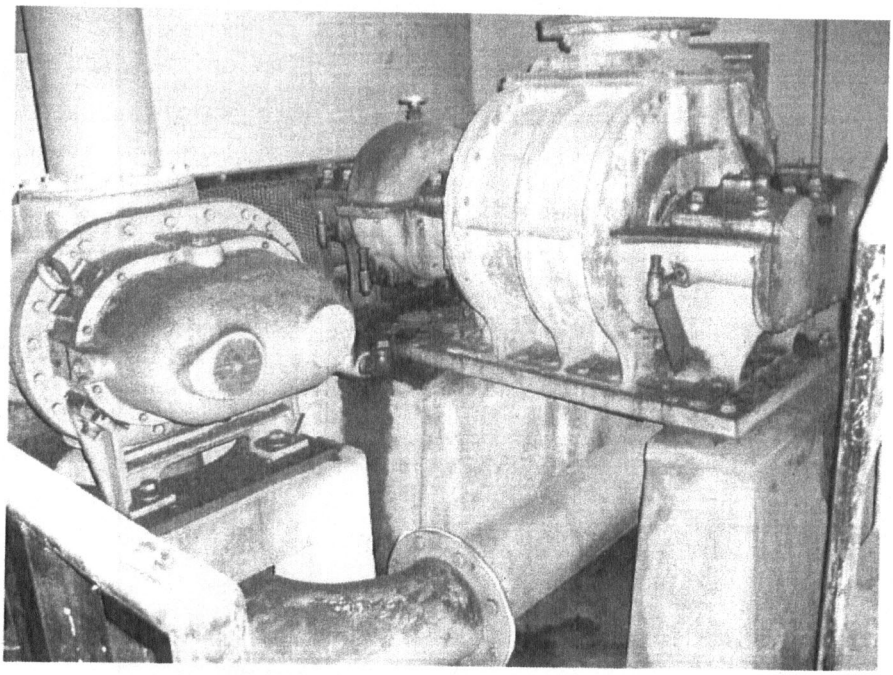
Photograph 10: Facing north; view of sealed floor drains on 1st floor of Building 14.



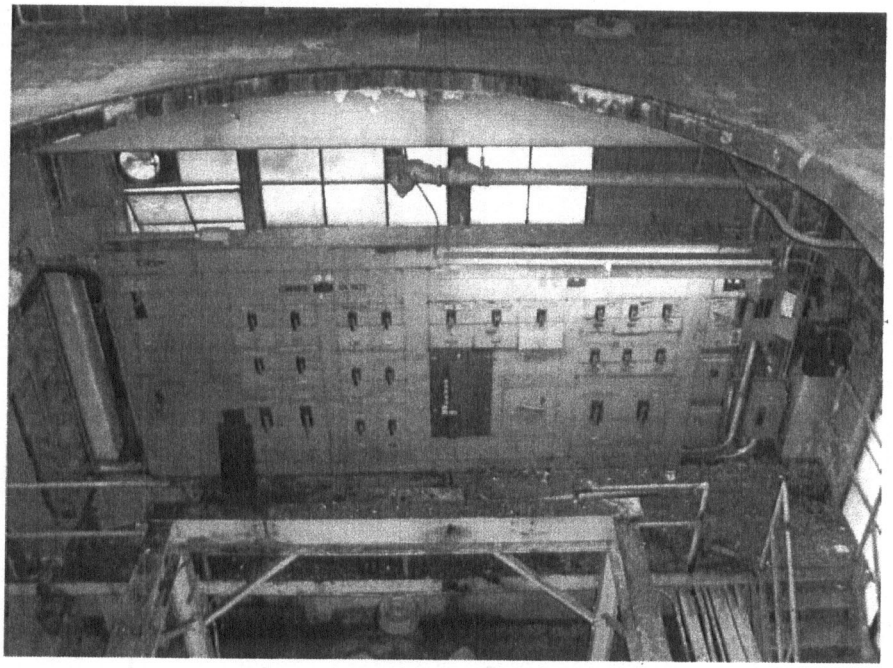
Photograph 11: Facing southeast; view of damaged concrete where support pillar meets ceiling on 1st floor of Building 14.



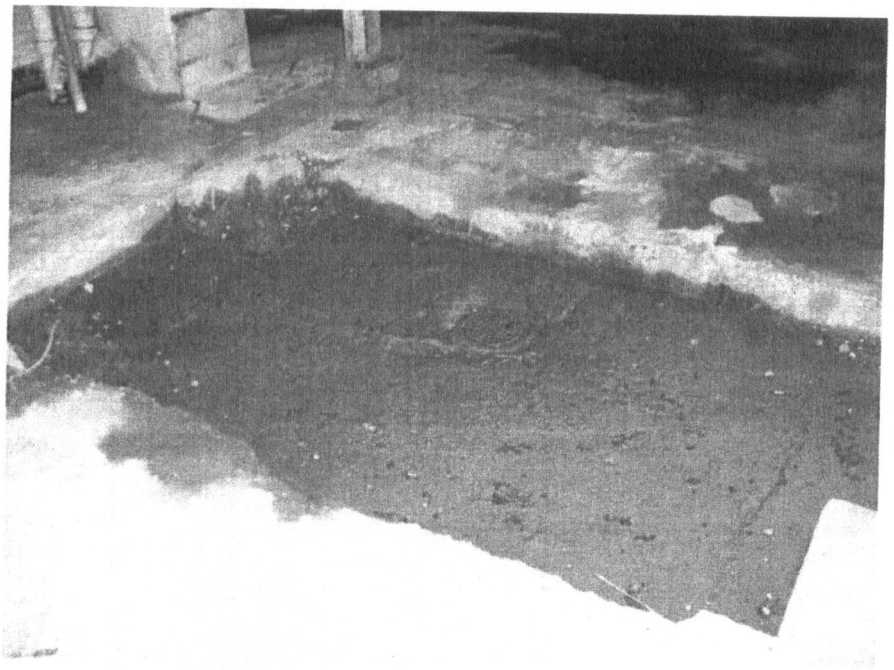
Photograph 12: Facing northeast; view of pooled oil beneath aboveground storage tank on 2nd floor of Building 14.



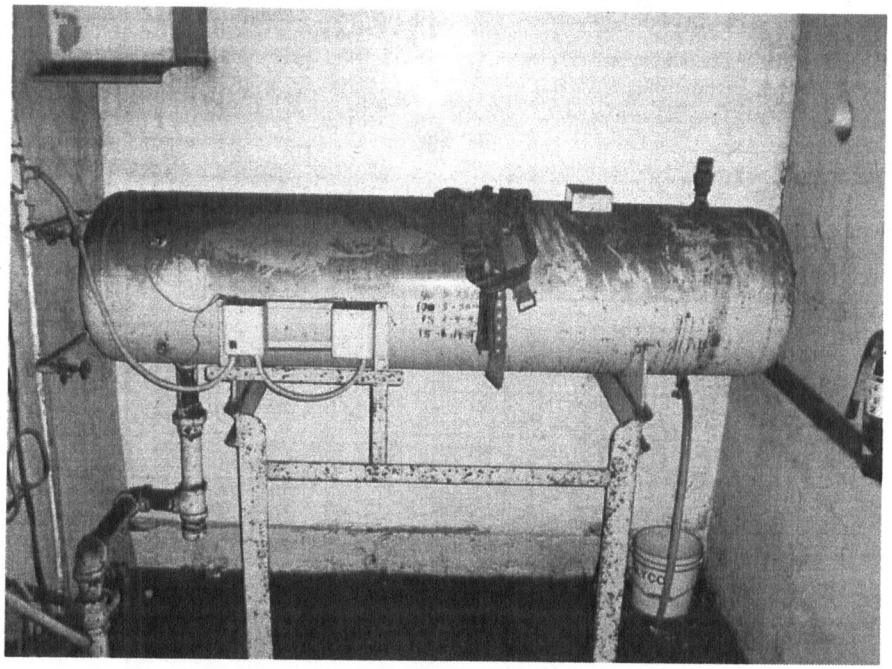
Photograph 13: Facing northeast; view of equipment associated with the grain and malt transfer system in Building 20.



Photograph 14: Facing north; view through hole formerly occupied by brewing kettle on 3rd floor of Building 21, and electric panel on 2nd floor.



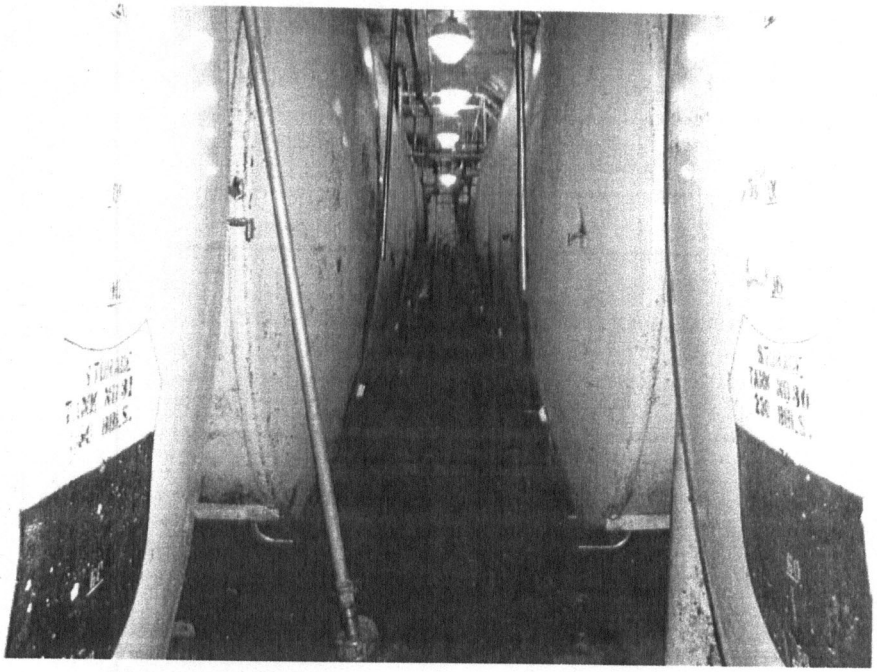
Photograph 15: Facing northwest; view of recessed pit and floor drain on 1st floor of Building 21.



Photograph 16: Facing north; view of Glycol-mixture tank in northeastern corner on 3rd floor of Building 21.

Photograph 17: Facing west; view of staining around drain on 6th floor of Building 21.

Photograph 18: Facing southeast; view of staining on wall, ceiling, and vent plenums on 2nd floor of Building 25, near rear exit.



Photograph 19. Facing south; view of fermentation aboveground storage tanks on 3rd floor of Building 25.

Photograph 20. Facing southeast; view of abandoned forklift in driveway beneath Building 21.

Photograph 21. Facing northwest; view of abandoned storage vessel located adjacent to the entrance to Building 20.

S Stevens St/Tully's catch basin samples (dry weight).

Station ID	SQS[a] MTCA	CSL[a]	RCB37[b]	RCB38	CB73	CB74	CB75	CB76	RCBSTV1	RCBSTV2	RCBSTV3	RCBSTV4
Date			06/30/04	06/30/04	10/19/05	10/19/05	10/19/05	10/19/05	08/31/04	08/31/04	08/31/04	08/31/04
TOC (%)			5.44	3.16	NA	12.0	NA	NA	NA	NA	NA	NA
Metals (mg/kg DW)												
Arsenic	57	93	7 U	7 U	NA	30 U	NA	NA	NA	NA	NA	NA
Copper	390	390	**58.8**	**57.7**	NA	**362**	NA	NA	NA	NA	NA	NA
Lead	450	530	**62**	**99**	NA	**430**	NA	NA	NA	NA	NA	NA
Mercury	0.41	0.59	0.06 U	**0.06**	NA	**1.51**	NA	NA	NA	NA	NA	NA
Zinc	410	960	**189**	**197**	NA	**1,810**	NA	NA	NA	NA	NA	NA
Total petroleum hydrocarbons (mg/kg DW)												
TPH -diesel	2,000		**220**	**230**	NA	**740**	NA	NA	NA	NA	NA	NA
TPH-oil	2,000		**1,200**	**1,300**	NA	**3,400**	NA	NA	NA	NA	NA	NA
LPAH (ug/kg DW)												
Acenaphthene			**78**	**1,200**	NA	44 U	NA	NA	NA	NA	NA	NA
Acenaphthylene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Anthracene			**180**	**2,000**	NA	44 U	NA	NA	NA	NA	NA	NA
Fluorene			**120**	**1,400**	NA	**81**	NA	NA	NA	NA	NA	NA
Naphthalene			**70**	**1,100**	NA	**2,500**	NA	NA	NA	NA	NA	NA
Phenanthrene			**1,000**	**9,100**	NA	**870**	NA	NA	NA	NA	NA	NA
HPAH (ug/kg DW)												
Benzo(a)anthracene			**520**	**2,700**	NA	**190**	NA	NA	NA	NA	NA	NA
Benzo(a)pyrene			**420**	**2,000**	NA	**98**	NA	NA	NA	NA	NA	NA
Benzo(b)fluoranthene			**820**	**3,000**	NA	**200**	NA	NA	NA	NA	NA	NA
Benzo(g,h,i)perylene			**130**	**330**	NA	44 UJ	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene			**520**	**1,900**	NA	**170**	NA	NA	NA	NA	NA	NA
Chrysene			**750**	**2,900**	NA	**280**	NA	NA	NA	NA	NA	NA
Dibenz(a,h)anthracene			56 U	**87**	NA	44 U	NA	NA	NA	NA	NA	NA
Fluoranthene			**1,700**	**10,000**	NA	**920**	NA	NA	NA	NA	NA	NA
Indeno(1,2,3-cd)pyrene			**140**	**460**	NA	**44**	NA	NA	NA	NA	NA	NA
Pyrene			**1,600**	**7,200**	NA	**490**	NA	NA	NA	NA	NA	NA
Phthalates (ug/kg DW)												
Bis(2-ethylhexyl)phthalate			**8,300**	**3,300**	NA	**13,000**	NA	NA	NA	NA	NA	NA
Butylbenzylphthalate			**410**	**270**	NA	**1,000**	NA	NA	NA	NA	NA	NA
Diethylphthalate			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Dimethylphthalate			**540**	54 U	NA	**1,000**	NA	NA	NA	NA	NA	NA
Di-n-butylphthalate			**61**	**120**	NA	**52,000**	NA	NA	NA	NA	NA	NA
Di-n-octyl phthalate			**760**	**210**	NA	**2,400**	NA	NA	NA	NA	NA	NA
PCBs (ug/kg DW)												
Aroclor 1016			130 U	130 U	150,000 U	180 U	31,000 U	26,000	1,600 U	420 U	19 U	1,100 U
Aroclor 1221			130 U	130 U	150,000 U	180 U	31,000 U	26,000	1,600 U	420 U	19 U	1,100 U

Station ID	TUL-CB1	TUL-CB2	TUL-CB3	TUL-CB4	RCB37	RCB125	RCB126	RCB127
Date	01/09/08	01/09/08	01/09/08	01/09/08	01/11/08	01/11/08	01/11/08	01/11/08
TOC (%)	NA	NA	NA	NA	7.40	6.91	9.79	10.90
Metals (mg/kg DW)								
Arsenic	NA	NA	NA	NA	**10**	**10**	20 U	20 U
Copper	NA	NA	NA	NA	**127**	**115**	**153**	**127**
Lead	NA	NA	NA	NA	**94**	**82**	**74**	**65**
Mercury	NA	NA	NA	NA	**0.11**	**0.11**	**0.2**	0.2 U
Zinc	NA	NA	NA	NA	**496**	**459**	**793**	**674**
Total petroleum hydrocarbc								
TPH -diesel	NA	NA	NA	NA	NA	NA	NA	NA
TPH-oil	NA	NA	NA	NA	NA	NA	NA	NA
LPAH (ug/kg DW)								
Acenaphthene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Acenaphthylene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Anthracene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Fluorene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Naphthalene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Phenanthrene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
HPAH (ug/kg DW)								
Benzo(a)anthracene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Benzo(a)pyrene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Benzo(b)fluoranthene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Benzo(g,h,i)perylene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Benzo(k)fluoranthene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Chrysene	NA	NA	NA	NA	950 U	910 U	650 U	**670**
Dibenz(a,h)anthracene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Fluoranthene	NA	NA	NA	NA	**1,000**	**1,000**	**1,000**	**1,100**
Indeno(1,2,3-cd)pyrene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Pyrene	NA	NA	NA	NA	**1,700**	**1,100**	**1,100**	**1,200**
Phthalates (ug/kg DW)								
Bis(2-ethylhexyl)phthalate	NA	NA	NA	NA	**18,000**	**15,000**	**11,000**	**20,000**
Butylbenzylphthalate	NA	NA	NA	NA	950 U	910 U	1,400 U	660 U
Diethylphthalate	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Dimethylphthalate	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Di-n-butylphthalate	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Di-n-octyl phthalate	NA	NA	NA	NA	**3,200**	**1,600**	1,300 U	**2,000**
PCBs (ug/kg DW)								
Aroclor 1016	580 U	110 U	24,000 U	460 U	170 U	160 U	20 U	20 U
Aroclor 1221	580 U	110 U	24,000 U	460 U	170 U	160 U	20 U	20 U

S Stevens St/Tully's catch basin samples (dry weight).

Station ID	SQS[a]	CSL[a]	RCB37[b]	RCB38	CB73	CB74	CB75	CB76	RCBSTV1	RCBSTV2	RCBSTV3	RCBSTV4
Date	MTCA		06/30/04	06/30/04	10/19/05	10/19/05	10/19/05	10/19/05	08/31/04	08/31/04	08/31/04	08/31/04
Aroclor 1232			130 U	130 U	150,000 U	180 U	31,000 U	260,000	1,600 U	420 U	19 U	1,100 U
Aroclor 1242			130 U	130 U	150,000 U	180 U	31,000 U	26,000	1,600 U	420 U	19 U	1,100 U
Aroclor 1248			130 U	130 U	150,000 U	**2,900**	31,000 U	26,000	1,600 U	420 U	19 U	1,100 U
Aroclor 1254			**11,000**	**1,800**	**800,000**	**8,800**	**96,000**	**1,200,000**	**9,000**	**1,500**	**130**	**12,000**
Aroclor 1260			**6,500**	**1,100**	**540,000**	**8,100**	**79,000**	**1,000,000**	**8,000**	**1,100**	**71**	**11,000**
Total PCBs	1,000		**17,500**	**2,900**	**1,340,000**	**19,800**	**175,000**	**2,200,000**	**17,000**	**2,600**	**201**	**23,000**
Other organic compounds (ug/kg DW)												
1,2,4-Trichlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2,2'-Oxybis(1-chloropropane)			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2,4,5-Trichlorophenol			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2,4,6-Trichlorophenol			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2,4-Dichlorophenol			170 U	160 U	NA	220 U	NA	NA	NA	NA	NA	NA
2,4-Dimethylphenol[c]	29	29	56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2,4-Dinitrophenol			560 U	540 U	NA	440 U	NA	NA	NA	NA	NA	NA
2,4-Dinitrotoluene			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2,6-Dinitrotoluene			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2-Chloronaphthalene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2-Chlorophenol			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
2-Methylnaphthalene			56 U	**360**	NA	**490**	NA	NA	NA	NA	NA	NA
2-Methylphenol			56 U	54 U	NA	**360**	NA	NA	NA	NA	NA	NA
2-Nitroaniline			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
2-Nitrophenol			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
3,3'-Dichlorobenzidine			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
3-Nitroaniline			330 U	320 U	NA	220 U	NA	NA	NA	NA	NA	NA
4,6-Dinitro-2-methylphenol			560 U	540 U	NA	440 U	NA	NA	NA	NA	NA	NA
4-Bromophenyl-phenylether			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
4-Chloro-3-methylphenol			110 U	110 U	NA	220 U	NA	NA	NA	NA	NA	NA
4-Chloroaniline			170 U	160 U	NA	220 U	NA	NA	NA	NA	NA	NA
4-Chlorophenyl-phenylether			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
4-Methylphenol[c]	670	670	**370**	**250**	NA	**17,000**	NA	NA	NA	NA	NA	NA
4-Nitroaniline			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
4-Nitrophenol			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
Benzoic acid[c]	650	650	560 U	540 U	NA	440 U	NA	NA	NA	NA	NA	NA
Benzyl alcohol[c]			56 U	54 U	NA	**150**	NA	NA	NA	NA	NA	NA
bis(2-Chloroethoxy) methane			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA

Station ID	TUL-CB1	TUL-CB2	TUL-CB3	TUL-CB4	RCB37	RCB125	RCB126	RCB127
Date	01/09/08	01/09/08	01/09/08	01/09/08	01/11/08	01/11/08	01/11/08	01/11/08
Aroclor 1232	580 U	110 U	24,000 U	460 U	170 U	160 U	20 U	20 U
Aroclor 1242	580 U	110 U	24,000 U	460 U	170 U	160 U	20 U	20 U
Aroclor 1248	580 U	110 U	24,000 U	460 U	170 U	160 U	49 Y	20 U
Aroclor 1254	**10,000**	**4,800**	**110,000**	**9,500**	**1,100**	**8,500**	**81**	**98**
Aroclor 1260	**7,100**	**3,600**	**79,000**	**8,300**	**1,200**	**8,700**	**100**	**54**
Total PCBs	**17,100**	**8,400**	**189,000**	**17,800**	**2,300**	**17,200**	**181**	**152**
Other organic compounds (								
1,2,4-Trichlorobenzene		NA	NA	NA	950 U	910 U	650 U	660 U
1,2-Dichlorobenzene		NA	NA	NA	950 U	910 U	650 U	660 U
1,3-Dichlorobenzene		NA	NA	NA	950 U	910 U	650 U	660 U
1,4-Dichlorobenzene		NA	NA	NA	950 U	910 U	650 U	660 U
2,2'-Oxybis(1-chlo		A	NA	NA	950 U	910 U	650 U	660 U
2,4,5-Trichloro			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
2,4,6-Trich			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
2,4-Di			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
2,4			NA	NA	950 U	910 U	650 U	660 U
			A	NA	9,500 U	9,100 U	6,500 U	6,600 U
				NA	4,700 U	4,600 U	3,200 U	3,300 U
				NA	4,700 U	4,600 U	3,200 U	3,300 U
				NA	950 U	910 U	650 U	660 U
				NA	950 U	910 U	650 U	660 U
				NA	950 U	910 U	650 U	**660** U
2-M			NA	NA	950 U	910 U	650 U	660 U
2-Nitroa			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
2-Nitrophe			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
3,3'-Dichlorob			NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
3-Nitroaniline		A	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
4,6-Dinitro-2-methylp		NA	NA	NA	9,500 U	9,100 U	6,500 U	6,600 U
4-Bromophenyl-phenyle		NA	NA	NA	950 U	910 U	650 U	660 U
4-Chloro-3-methylphenol		NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
4-Chloroaniline		NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
4-Chlorophenyl-phenylether	NA	NA	NA	NA	950 U	910 U	650 U	660 U
4-Methylphenol[c]	NA	NA	NA	NA	950 U	910 U	650 U	**2,500**
4-Nitroaniline	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
4-Nitrophenol	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
Benzoic acid[c]	NA	NA	NA	NA	9,500 U	9,100 U	6,500 U	6,600 U
Benzyl alcohol[c]	NA	NA	NA	NA	950 U	910 U	650 U	**1,100**
bis(2-Chloroethoxy) methane	NA	NA	NA	NA	950 U	910 U	650 U	660 U

S Stevens St/Tully's catch basin samples (dry weight).

Station ID	SQS[a]	CSL[a]	RCB37[b]	RCB38	CB73	CB74	CB75	CB76	RCBSTV1	RCBSTV2	RCBSTV3	RCBSTV4
Date	MTCA		06/30/04	06/30/04	10/19/05	10/19/05	10/19/05	10/19/05	08/31/04	08/31/04	08/31/04	08/31/04
Bis-(2-chloroethyl) ether			110 U	110 U	NA	44 U	NA	NA	NA	NA	NA	NA
Carbazole			**110**	**1,400**	NA	44 U	NA	NA	NA	NA	NA	NA
Dibenzofuran			56 U	**830**	NA	**57**	NA	NA	NA	NA	NA	NA
Hexachlorobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Hexachlorobutadiene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Hexachlorocyclopentadiene			280 U	270 U	NA	220 U	NA	NA	NA	NA	NA	NA
Hexachloroethane			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Isophorone			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
Nitrobenzene			56 U	54 U	NA	44 U	NA	NA	NA	NA	NA	NA
n-Nitroso-di-n-propylamine			110 U	110 U	NA	220 U	NA	NA	NA	NA	NA	NA
N-Nitrosodiphenylamine			56 U	54 U	NA	100 Y	NA	NA	NA	NA	NA	NA
Pentachlorophenol[c]	360	690	280 U	270 U	NA	220 UJ	NA	NA	NA	NA	NA	NA
Phenol[c]	420	1,200	56 U	**100**	NA	**1,900**	NA	NA	NA	NA	NA	NA

a. Sediment management standards. SQS = sediment quality standard. CSL = cleanup screening level.

b. SPU cleaned CB in 2004-2005

c. Sediment management standard based on dry weight concentration.

MTCA = Method A soil cleanup level for unrestricted use.

Exceeds sediment quality standards (SQS)

Exceeds cleanup screening level (CSL)

J = Concentration is less than the reporting limit.

U = Chemical not detected at concentration shown

Y = Chemical not detected at concentration shown. Reporting limit raised due to background interference.

Data not validated

S Stevens St/Tully's catch

Station ID	TUL-CB1	TUL-CB2	TUL-CB3	TUL-CB4	RCB37	RCB125	RCB126	RCB127
Date	01/09/08	01/09/08	01/09/08	01/09/08	01/11/08	01/11/08	01/11/08	01/11/08
Bis-(2-chloroethyl) ether	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Carbazole	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Dibenzofuran	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Hexachlorobenzene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Hexachlorobutadiene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Hexachlorocyclopentadiene	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
Hexachloroethane	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Isophorone	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Nitrobenzene	NA	NA	NA	NA	950 U	910 U	650 U	660 U
n-Nitroso-di-n-propylamine	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
N-Nitrosodiphenylamine	NA	NA	NA	NA	950 U	910 U	650 U	660 U
Pentachlorophenol[c]	NA	NA	NA	NA	4,700 U	4,600 U	3,200 U	3,300 U
Phenol[c]	NA	NA	NA	NA	950 U	910 U	650 U	660 U